

HEREBY ISSUES AN ORDER OF APPROVAL
TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 18019

Date

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Replacement of equipment at an existing, completely enclosed asphalt plant consisting of: one (1) new H&R drum mixer (400 tons/hr) with a 125 MMBtu/hr burner and four existing asphalt storage silos (200 tons each) controlled by an existing H&R Mechanical Pulse Jet 806-6-12 baghouse (80,000 cfm); six raw material (sand and aggregate) belt conveyors; five aboveground liquid asphalt storage tanks (one 25,700 gallon; two 12,000 gallon, one 10,200 gallon, and one 30,000 gallon); and reclaimed asphalt pavement (RAP) and recycled asphalt shingle (RAS) feeding equipment, including a RAP feed bin (160 ton/hr), RAS feed bin (20 ton/hr), and associated conveyors.

OWNER

Cadman Materials, Inc. (Cadman)
Debbie Wilson, PO Box 97038
Redmond, WA 98073

INSTALLATION ADDRESS

Cadman Materials, Inc. (Cadman)
300 W Marine View Dr
Everett, WA 98201

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

NEW SOURCE PERFORMANCE STANDARDS

3. This hot mix asphalt facility is subject to the federal Standards of Performance for Asphalt Concrete Plants under 40 CFR Part 60, Subpart I, and General Provisions under 40 CFR Part 60, Subpart A, as required by Conditions 4, 5, and 6 of this Order of Approval.
4. The owner or operator subject to the provisions of this subpart shall not discharge or cause the discharge into the atmosphere from any affected facility any gases which:
 - a) Contain particulate matter in excess of 90 mg/dscm (0.04 gr/dscf).
 - b) Exhibit 20 percent opacity, or greater.
5. The owner or operator shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a monitoring device is inoperative.
6. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

EMISSION LIMITS

7. The existing rotary dryer and pug mill mixer shall be removed from service prior to the first operation of

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the new H&R drum mixer. A record of the date of the last operation of the existing rotary dryer and pug mill mixer and the date of the first operation of the new H&R drum mixer shall be kept on file for Agency inspection.

8. Emissions from the asphalt storage silos shall be controlled by the H&R Mechanical Pulse Jet 806-6-12 baghouse.
9. Total particulate matter emissions from the plant exhaust stack shall not exceed 0.027 gr/dscf (corrected to 7% O₂) as measured by U.S. EPA Method 5 as modified by Puget Sound Clean Air Agency Board Resolution 540 dated August 11, 1983.
10. Filterable particulate matter emissions from the plant exhaust stack shall not exceed 0.014 gr/dscf (corrected to 7% O₂) as measured by U.S. EPA Method 5 as modified by Puget Sound Clean Air Agency Board Resolution 540 dated August 11, 1983.
11. Opacity from the plant exhaust stack shall not exceed 5% opacity for a period or periods aggregating more than 3 minutes during any one hour as measured by WDOE Method 9A.
12. Emissions of Non-Methane/Non-Ethane VOC (NMNEVOC) shall not exceed 0.032 lb NMNEVOC per ton of hot mixed asphaltic concrete produced. Compliance with this limit shall be determined by the average of three 60-minute test runs performed in accordance with Section 3.07 of PSCAA Regulation I and using EPA reference methods 1, 3A, 4, and 25A (using either an FID with a methane “cutter”, OR using EPA Method 320 or EPA Method 18 to analyze for methane and ethane, and subtracting the methane and ethane results from the total VOC measured by the FID analyzer) from Appendix A of 40 CFR Part 60. NMNEVOC shall be expressed as propane. Other equivalent test methods may be used with prior written approval of the Agency.
13. Emissions of carbon monoxide shall not exceed 311.0 ppmvd (corrected to 7% O₂) as determined by the average of three 60-minute test runs performed in accordance with Section 3.07 of PSCAA Regulation I and using USEPA reference methods 1, 3A, 4, and 10 from Appendix A of 40 CFR Part 60.
14. Emissions of oxides of nitrogen shall not exceed 26.0 ppmvd (corrected to 7% O₂) as determined by the average of three 60-minute test runs performed in accordance with Section 3.07 of PSCAA Regulation I using USEPA reference methods 1, 3A, 4, and 7E from Appendix A of 40 CFR Part 60.
15. There shall be no visible emissions from the reclaimed asphalt pavement (RAP) and recycled asphalt shingle (RAS) feed bins and conveyors.

FACILITY-WIDE EMISSION LIMIT

16. Facility-wide emissions of carbon monoxide shall not exceed 99.0 tons during any 12 consecutive months after the date of this Order.
17. Within 30 days of the end of each month, the owner or operator shall calculate the facility-wide carbon monoxide emissions for the previous 12 months using the monthly natural gas usage and either the BACT emission limit in Condition 13 or the results of the most recent carbon monoxide emission test that shows compliance with the BACT emission limit in Condition 13. For the purposes of this calculation, the BACT limit in Condition 13 or the source test results shall be converted to into terms of pounds of carbon monoxide per million Btu of fuel used using EPA Method 19.
18. The owner or operator shall notify the Puget Sound Clean Air Agency in writing, within 30 days after the end of each 12-month period if, during that period, emissions of CO exceed 90 tons. The report shall

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include emissions data for the time period for which these thresholds were exceeded.

19. By June 30th of each calendar year, the owner or operator must report to PSCAA the total emissions of carbon monoxide for the previous calendar year. The owner or operator must also report the emissions of any pollutant that exceeded the thresholds in PSCAA Regulation I, Section 5.05(b) for the previous calendar year. These emission reports must be submitted via email to EmissionReporting@pscleanair.org or in the most current method in which PSCAA is receiving electronic submittal.

PRODUCTION LIMIT

20. The owner or operator shall record and limit the total production of asphalt to no more than 350,000 tons for any 12 consecutive months.
21. A notification of a violation of Condition 20 shall be sent to Puget Sound Clean Air Agency within 30 days following any month when the 12 consecutive month rolling total exceeds 350,000 tons per year of asphalt production.

OPERATING REQUIREMENTS

22. Prior to the initial startup of the new drum mixer, the owner or operator shall install signs precluding general public access along the northwest shoreline of the facility property. The signs must be posted in plain view, and each sign must be free of obstruction and clearly legible from the water. Each sign must state "No Trespassing. Private Property within 120 feet from shoreline", or similar language. A Public Access Control Plan shall be developed and submitted to the Agency, inclusive of a location map and photographs. The owner or operator shall incorporate the Public Access Control Plan in the facility Operations and Maintenance Plan required by Regulation I, Section 5.05. If the Public Access Control Plan needs to be updated, the owner or operator shall notify the Agency of any substantive changes.
23. The temperature of the asphaltic concrete mix exiting the drum mixer shall not exceed the optimum mix temperature +25°F for each product specification as set out in the product's current Mix Design Evaluation Report. Documentation of each product's Mix Design Evaluation Report including optimum mix temperature shall be kept on file and incorporated into the Operations and Maintenance plan required by Agency Regulation I, Section 5.05(c).
24. Each hourly combined total recycled asphalt (RA) percentage, consisting of recycled asphalt pavement (RAP) and recycled asphalt shingles (RAS), monitored and recorded per Condition 32 shall not exceed the average RA percentage by weight used in a passing source test of Conditions 9 through 14. To set a greater RA limit, the facility can choose at any time to conduct a new test (at a greater RA percentage than previous tests), that demonstrates compliance with the limits in Conditions 9 through 14.
25. The owner or operator shall not use RAS that contains asbestos, as defined in Agency Regulation III, Section 4.01(c). The owner or operator shall collect samples for every load of RAS received and have the samples analyzed using polarized light microscopy by an independent third party in accordance with 40 CFR 763, Subpart E, Appendix E, Section 1, to demonstrate that RAS is asbestos-free. As an alternative to the sampling in this condition, for each delivered load of RAS, the owner or operator shall collect documentation from the supplier that shows that the sampling and analysis were completed in accordance with 40 CFR 763, Subpart E, Appendix E, Section 1, and the results of the analysis. The delivery log and all bulk sample analysis results shall be maintained on-site and available for inspection for a period of two years.
26. Records of every delivery of RAS shall be maintained confirming the origin, supplier, and amount (mass) of RAS.

27. The H&R Mechanical Pulse Jet 806-6-12 baghouse shall be equipped with a gauge measuring the pressure drop across the baghouse. The pressure gauge shall be in operation whenever the baghouse is in operation. The pressure gauge shall be marked with the acceptable pressure drop range. The maximum acceptable pressure drop shall be determined from manufacturer specifications for the bags used in the baghouse. The minimum acceptable pressure drop shall be determined from manufacturer specifications for the bags used in the baghouse. The pressure drop observed during the most recent compliance source test shall fall within the defined acceptable range of pressure drop. The acceptable range and the basis for the range shall be included in the facility Operations and Maintenance plan required by Agency Regulation I, Section 5.05(c)

SOURCE TESTING

28. The owner or operator shall notify the Puget Sound Clean Air Agency within 15 days of initial startup of the new H&R drum mixer. The owner or operator shall submit the notification to facilitysubmittal@pscleanair.org.

29. The owner or operator shall test emissions for compliance with Conditions 9 through 14 of this Order within 90 days after achieving the maximum production rate, but no later than 180 days after initial startup of this plant. The owner or operator shall also test emissions for compliance with Conditions 9 through 14 at least every five years. The owner or operator shall submit a compliance test plan with the test notification submitted under Regulation I, Section 3.07(b) at least 30 days prior to each compliance test. The test plan shall detail the test methods used for each pollutant, the operational data that will be collected during the test, and any other relevant information about the test.

30. The owner or operator may conduct an emission test as set out in Condition 29 at any time (given notification as required in Regulation I, Section 3.07(b)) for the purposes of setting the RA limit in Condition 24. The owner or operator shall submit a compliance test plan with the test notification submitted under Regulation I, Section 3.07(b) at least 30 days prior to the compliance test.

31. During the emission tests required by Conditions 29 and 30, the following operational data shall be collected during each test run and reported in the source test report:

- a) Hourly weight of RAP and RAS used, plus the hourly weight of asphalt produced;
- b) hourly average RA (RAP plus RAS) total percent by weight usage
- c) standard cubic feet of fuel combusted;
- d) aggregate moisture percentage (as measured by the Quality Control lab for a representative sample taken the day of the test);
- e) asphalt cement content percentage;
- f) baghouse pressure drop;
- g) baghouse fan speed (as a percentage of full speed);
- h) baghouse pulse cycle time;
- i) flue gas damper setting (as a percentage of maximum opening);
- j) maximum temperature of mix as it exits the drum mixer; and
- k) product specification produced during the run, a copy of the specification, and maximum temperature allowed by the specification.

MONITORING

32. When operating, the owner or operator shall monitor and record the following information:

- a) one daily pressure drop across the baghouse;
- b) one daily inspection for visible emissions and particulate fallout for the baghouse and RAP and RAS feed bins and conveyors;
- c) hourly weight of RA (RAP plus RAS) used, plus the hourly weight of asphalt produced;
- d) calculated hourly average RA (RAP plus RAS) total percent by weight usage;
- e) annual (12 consecutive months rolling total) asphalt production;
- f) monthly fuel use;
- g) one mix temperature reading recorded for each hour in which the drum mixer operates;
- h) the product specification produced and the hour it was produced; and
- i) the time (in hours) the drum mixer operated.

COMPLAINTS

33. The owner or operator shall establish a complaint response program as part of the O&M Plan. The program shall include a complaint phone line, criteria and methods for establishing whether Cadman Materials, Inc. may be the source of emissions related to the complaint, and a format for communicating results of investigation and advising complainants of Cadman Materials, Inc. corrective actions.

- a) The owner or operator shall record and investigate complaints received regarding air quality as soon as possible, but no later than one working day after receipt.
- b) The owner or operator shall correct any problems identified by these complaint investigations within 24 hours of identification or cease operation of the equipment until the problem is resolved;
- c) Records of all complaints received regarding air quality issues shall include information regarding date and time of complaint; name and address of complainant (if known); nature of the complaint; investigation efforts completed and basis for conclusion reached; and date, time, and nature of any corrective action taken.

RECORDS

34. The owner or operator shall maintain records required by this Order of Approval, as well as the records identified in the Operation and Maintenance Plan required by Regulation I, Section 5.05, for two years and make them available to Puget Sound Clean Air Agency personnel upon request.

35. Upon startup of the equipment reviewed under this Order of Approval, this Order supersedes and cancels Order of Approval No. 6643 dated September 12, 1996.

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APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.

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Reviewing Engineer

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