

**Alaska Department of Environmental Conservation
Air Permits Program**

STATEMENT OF BASIS

**of the terms and conditions for
General Permit No 3**

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INTRODUCTION

The Stationary Sources¹ authorized to operate under this general operating permit are commonly referred as *hot mix asphalt plants* (Asphalt Plants), or Asphalt Plants and rock crushing operations as long as the crushing operations are located on a contiguous or adjacent property to the hot mix asphalt plant, and are under common control of the same person (or persons under common control), belonging to a single major industrial grouping, with a combined potential-to-emit of 100 tons per year or more of any regulated pollutant.

The operations of Asphalt Plants are described under Standard Industrial Classification codes 29 which include the production of asphalt concrete for the manufacturing of paving products. Although rock crushing activities on their own may be classified under SIC Industry Group 14, under this permit, these rock crushing activities are assumed to be support activities to the Asphalt Plant covered under this general permit.

Condition 45 of this General Permit 3 (GP3) includes specific provisions that require the Permittee to comply with the Alaska Coastal Management Program.

Excluded Facilities

The permit excludes a Stationary Source from using the General Permit 3 if the Stationary Source has specific limits or otherwise applicable requirements not listed in General Permit 3 and the Stationary Source is not covered under another operating permit that lists those specific limits or otherwise applicable requirements.

¹ *Stationary Source* means any building, structure, facility or installation that emits or may emit any regulated air pollutant or any pollutant listed under section 112(b) of the Act (40 C.F.R. 71.2).

STATEMENT OF BASIS FOR THE PERMIT CONDITIONS

The state and federal regulations for each condition are cited in Operating Permit No. AQXXXXGP303. The Statement of Basis provides the legal and factual basis for each term and condition as set forth in 40 C.F.R. 71.6(a)(1)(i).

Conditions 1 - 7 - Visible Emissions Standard Requirements

Legal Basis: These conditions ensure compliance with the applicable requirements in 18 AAC 50.050(a) and 18 AAC 50.055(a).

18 AAC 50.055(a) applies to the operation of industrial processes and fuel-burning equipment. The asphalt drum/dryer and stationary diesel engines are fuel burning equipment subject to 18 AAC 50.055(a).

U.S. EPA incorporated these standards as revised in 2002 into the State Implementation Plan effective September 13, 2007.

An asphalt plant² constructed or modified after June 11, 1973, may not reduce visibility through the exhaust effluent by 20 percent or greater averaged over any six consecutive minutes, as specified in 18 AAC 50.055(a)(4). All other industrial processes and fuel burning equipment at this source may not reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes, as specified in 18 AAC 50.055(a)(1). Asphalt plants are industrial processes while the asphalt drum/dryer and diesel engines are fuel-burning equipment. Therefore the same standard applies to the diesel engines used for power generation for an asphalt plant and to asphalt plants built on or before June 11, 1973.

Condition 1 requires the Permittee to comply with the visible emission standard for asphalt plants and diesel engines, including fugitive emissions from asphalt plants. Conditions 2 – 4 and 5 – 7 address the visible emissions (VE) monitoring, recordkeeping, and reporting (MR&R) for asphalt plants and (liquid-fired) diesel engines, respectively. The dust control plan, condition 51.2, also addresses VE MR&R for fugitive emissions.

Emissions of nonroad engines are not included when determining the classification of a stationary source or modification under AS 46.14.130 (see 18 AAC 50.100).

Factual Basis: The visible emission monitoring, recordkeeping and reporting (MR&R) requirements for the Asphalt Plant are different from those for diesel engines because asphalt plants may produce visible emissions without smoke, which is typically associated with incomplete combustion. In the case of asphalt plants, visible emissions may also result from loose particulate from the aggregate fed into the mixing drum.

Thus, the MR&R requirements for diesel engines includes the Method 9 and the Smoke/No Smoke plans which are standard permit conditions required under 18 AAC 50.346(c). MR&R requirements for the asphalt plant deviate from those under 18 AAC 50.346(c) by excluding the possibility to monitor visible emissions

² In this permit, “asphalt plant” means all asphalt plant equipment (including the aggregate dryer and drum mixer), except the diesel engine and vehicles.

using the Smoke/No Smoke plan because particulate matter emissions from the aggregate are not considered “smoke.”

The visible emissions standard applies to stationary diesel engines and does not apply to nonroad engines. A nonroad engine has the meaning given in 40 C.F.R. 89.2. An engine will not be considered a nonroad engine if it remains at or will remain at a location for more than 12 consecutive months. An engine used at a single specific location for 12 months or longer ceased to be a nonroad engine when it was placed in that location.

Conditions 2 – 4 were adopted from Standard Permit Condition IX – Visible Emissions and Particulate Matter Monitoring Plan for Liquid-Fired Sources. The conditions were modified to reflect the mobility of asphalt plants and the seasonal nature of their operations. The condition requires VE readings after startup from periods of shut down and after relocating the plant. The conditions were further modified to exclude the Smoke/No Smoke plan since the emissions from the asphalt plant include particulate matter from the aggregate during the drying process and not a product of combustion. Condition 3.1(ii) was added to provide a reference to the operating level during the Method 9 observations.

Conditions 5 - 7 MR&R conditions for diesel engines are standard conditions adopted into regulation pursuant to AS 46.14.010(e).

The frequency of monitoring of visible emissions in condition 5.1 was changed from the Standard Operating Condition to reflect the seasonal nature of asphalt plant operation. Not requiring the first VE reading for six months could allow the diesel engine to operate without a VE reading for the year. The condition was also changed to reflect that a diesel generator at an asphalt plant does not operate on a continuous basis. The new requirement to conduct the first VE reading for the diesel engine within 15 days attempts to ensure the engine’s visible emissions are recorded during the operational period of asphalt production. The Department realizes that there is a potential for the asphalt plant to operate less than 15 days, but believes this requirement will protect the public.

Reoccurring monitoring for the diesel engine is kept at once per month as asphalt plants generally do not operate long enough to warrant the need for reduced monitoring. This also helps to alleviate missing VE readings by keeping the monitoring requirement simple.

The Smoke/No Smoke requirement in condition 5.2 was revised from the Standard Permit Condition to clarify the requirement that **anytime** smoke is observed they are to begin Method 9 observations or take corrective action to alleviate the smoke.

The standard permit condition option to continue an established monitoring frequency in the case of a permit renewal was removed. The frequency of required monitoring does not decrease over time in this permit, therefore this section of the standard permit condition does not apply.

Liquid-Fired Fuel Burning Equipment:

Monitoring – The visible emissions may be observed by either Method-9 or the Smoke/No Smoke plans as detailed in condition 5.2. Corrective actions such as

maintenance procedures and either more frequent or less frequent testing may be required depending on the results of the observations.

Recordkeeping – The Permittee is required to record the results of all visible emission observations and record any actions taken to reduce visible emissions.

Reporting – The Permittee is required to report: 1) emissions in excess of the State visible emissions standards and 2) deviations from permit conditions. The Permittee is required to include copies of the results of all visible emission observations with the facility operating report.

Gas-Fired Fuel Burning Equipment:

Monitoring, Recordkeeping, and Reporting – The monitoring of gas fired sources for visible emissions is waived, i.e. no source testing will be required. The Department has found that natural gas fired equipment inherently has negligible PM emissions. However, the Department can request a source test for PM emissions from any smoking equipment.

Conditions 8 – 12 - Particulate Matter (PM) Standard

Legal Basis: These conditions ensure compliance with the applicable requirement in 18 AAC 50.055(b). This requirement applies to operation of all industrial processes and fuel burning equipment in Alaska. These PM standards also apply because they are contained in the federally approved State Implementation Plan (SIP) effective September 13, 2007.

An Asphalt Plant built after June 11, 1973, may not emit PM in excess of 0.04 grains per dry standard cubic foot of exhaust as specified in 18 AAC 50.055(b)(5). (All other Asphalt Plants are subject to 18 AAC 50.055(b)(1), and may not emit in excess of 0.05 gr/dscf.)

Under 18 AAC 50.990(12), an "Asphalt Plant" means a stationary source that manufactures asphalt concrete by heating and drying aggregate and mixing asphalt cements; "Asphalt Plant" includes any combination of dryers, systems for screening, handling, storing, and weighing dried aggregate, systems for loading, transferring, and storing mineral filler, systems for mixing, transferring, and storing asphalt concrete, and emission control systems within the Stationary Source.

Under 18 AAC 50.055(b)(5), an asphalt plant constructed or modified after June 11, 1973 may not emit PM in excess of 0.04 grains per dry standard cubic foot of exhaust gas (gr/dscf). Under 18 AAC 50.055(b)(1), all other industrial processes and fuel burning equipment at the asphalt plant may not emit PM in excess of 0.05 gr/dscf. Asphalt plants are both industrial processes and fuel-burning equipment while diesel engines are fuel-burning equipment. Therefore the same standard applies to the diesel engines used for power generation for an asphalt plant and to asphalt plants built on or before June 11, 1973.

Asphalt plants are industrial processes while the asphalt drum/dryers are fuel-burning equipment. Conditions 8.1a and 8.1b establish the applicable PM standard for asphalt plants, depending on the date it was constructed, reconstructed, or modified. This permit does not include MR&R to demonstrate compliance with this particulate matter standard for fugitive emissions since Reference Method 5 of 40 C.F.R. 60,

which is used to determine compliance with this standard, is not applicable to fugitive emissions.

Conditions 8.2 – 8.6 are the monitoring, recordkeeping and reporting requirements to demonstrate compliance with the applicable PM standard for the asphalt drum/dryer.

The main purpose of condition 8.2 is to provide adequate monitoring requirements to demonstrate compliance with the PM state standards in condition 8.1. Periodic monitoring in Title V Operating permits is required under 40 C.F.R. 71.6(a)(3)(i)(B), which is adopted by reference under 18 AAC 50.040(j)(4).

The Department added condition 8.2e to clarify that the one-year PM source test requirement is delayed one year for each calendar year that the Permittee did not operate. (For example, if a Permittee triggered the PM source test requirement on July 1, 2009, then the PM source test would be due by July 1, 2010. However, if the Permittee did not operate in calendar years 2010 and 2011, and operated in 2012, then the PM source test will be due by July 1, 2012.) Condition 8.2e does not add any extra years to the five-year trigger in condition 8.2c if the calendar year that the Permittee did not operate was before the due date. (For example, if the Permittee did not operate in the third and fourth calendar years after getting the permit, but does operate more than thirty days per year thereafter, then the PM source test requirement within five years is not changed. However, if the Permittee does not operate during the calendar year that the PM source test is due, then the source test due date is delayed one year.) This avoidance does not change the Department's authority to request a source test under condition 56 — e.g., in response to public complaints or high opacity readings from the asphalt plant.

Diesel engines are fuel burning equipment. Condition 9 requires the Permittee to comply with the applicable PM standard(s) for diesel engines, including fugitive emissions from asphalt plants. Conditions 10 - 12 establish MR&R requirements to demonstrate compliance with the PM standard for (liquid-fired) diesel engines.

Factual Basis: The particulate matter standard applies to stationary diesel engines and does not apply to nonroad engines. A nonroad engine has the meaning given in 40 C.F.R. 89.2. An engine will not be considered a nonroad engine if it remains at or will remain at a location for more than 12 consecutive months. An engine used at a single specific location for 12 months or longer ceased to be a nonroad engine when it was placed in that location.

Liquid-Fired Fuel Burning Equipment:

For liquid-fired units, the MR&R conditions are a modified version of Standard Operating Permit Condition IX under 18 AAC 50.346(c), adopted into regulation pursuant to AS 46.14.010(e). Modification of Standard Operating Permit Condition IX consisted on removing the phrase “and not more than 20 percent” under condition 10.2b to clarify that any opacity greater than 15 percent from stacks of less than 18 inches in diameter would require compliance with condition 10.1. Also condition 12.2 was amended to correct a typo where a reference to condition 10.2b was made instead of 10.2.

Gas-Fired Fuel Burning Equipment:

Although periodic PM monitoring of gas-fired units is waived, the Department has the discretion to request a source test for PM emissions from any fuel burning equipment under 18 AAC 50.220(a) and 18 AAC 50.345(k).

Conditions 13 – 17- Sulfur Compound Emissions Standard Requirements

Legal Basis: These conditions require the Permittee to comply with the sulfur compound emission standard for all fuel-burning equipment and industrial processes in the State of Alaska. These sulfur compound standards are part of the federally approved SIP effective September 13, 2007.

Under 18 AAC 50.055(c) industrial processes and fuel burning equipment may not emit sulfur-compound emissions exceeding 500 parts per million (ppm) averaged over a period of three hours. Asphalt plants are industrial processes while the asphalt drum/dryer and diesel engines are fuel-burning equipment. Condition 13 requires the Permittee to comply with this standard for the asphalt drum/dryer and diesel engines. This does not apply to the other, nonfuel-burning parts of asphalt plants since they don't produce sulfur-compound emissions. Conditions 14 – 17 establish MR&R requirements to demonstrate compliance with this standard for (liquid and gas-fired) diesel engines.

Factual Basis: The sulfur-compound emissions standard applies to stationary diesel engines and does not apply to nonroad engines. A nonroad engine has the meaning given in 40 C.F.R. 89.2. An engine will not be considered a nonroad engine if it remains at or will remain at a location for more than 12 consecutive months. An engine used at a single specific location for 12 months or longer ceased to be a nonroad engine when it was placed in that location.

Liquid-Fired Fuel Burning Equipment:

For liquid-fired fuel burning equipment the MR&R conditions are Standard Operating Permit Conditions XI and XII under 18 AAC 50.346(c), adopted into regulation pursuant to AS 46.14.010(e). Condition 14 is modified from the standard condition to clarify that liquid fuel requirements apply to the use of used or recycled oil.

Gas-Fired Fuel Burning Equipment:

Fuel gas sulfur is measured as hydrogen sulfide (H₂S) concentration in ppm by volume (ppmv). The Department performed calculations³ that show that fuel gas containing no more than 4,000 ppm of H₂S will comply with this emission standard at stoichiometric (or zero excess air) combustion conditions. Given the case that excess air is normally greater than zero, the value of 4,000 ppm is conservative.

Equations to calculate the exhaust gas SO₂ concentrations resulting from the combustion of fuel gas were not included in this permit. Fuel gas with an H₂S concentration of even 10 percent of 4,000 ppm is currently not available in Alaska and is not projected to be available in the foreseeable future.

³ See ADEC Air Permits Web Site at <http://www.dec.state.ak.us/air/ap/docs/sulfgas.pdf>, under "Stoichiometric Mass Balance Calculations of Exhaust Gas SO₂ Concentration."

In any case, the Permittee is required to record the fuel gas H₂S concentration of the fuel gas. The Permittee is required to report as excess emissions whenever the fuel combusted causes sulfur compound emissions to exceed the standards in this condition. The Permittee is required to include copies of the records mentioned in the previous paragraph with the facility operating report.

Condition 18 – Used Oil used as fuel in Diesel Engines

Legal Basis: This condition requires the Permittee to comply with the sulfur compound emission standards for diesel engines when burning used or recycled oil. These sulfur compound standards are contained in the federally approved State Implementation Plan (SIP), effective September 13, 2007.

Factual Basis: Diesel engines are fuel-burning equipment capable of burning used or recycled oil. It is assumed that all the sulfur in the fuel is converted into sulfur dioxide (SO₂).

The terms under condition 18 more adequately meet the requirements of 40 C.F.R. 71.6(a)(3) than those monitoring-plan requirements under Standard Permit Condition IX – Visible Emissions and PM for Liquid-Fired Sources.

Condition 19 - Ambient Air Quality Protection – General Requirements

Legal Basis: This condition applies to all asphalt plants unless a stricter condition exists in this permit, State Statutes, or Federal Guidelines. 18 AAC 50.010 establishes the ambient air quality standards in the State of Alaska. The Permittee is required to comply with these requirements.

Factual Basis: The Department incorporated the same setback distance requirements as previously established in the 2003 General Permit for Asphalt Plants (GP3). The Department established the distances based on a generic air quality modeling (see Attachment 2) analysis it conducted to address public complaints regarding alleged impacts.⁴ The Department used the U.S. Environmental Protection Agency's (EPA's) ISCST3 dispersion modeling software to conduct the air dispersion modeling in 2003. The Department also created a screening meteorological data set, in order to make the analysis applicable for the entire State.

The Department established the setback distance requirement in condition 19.1 in order to protect the three hour SO₂ ambient air quality standard. The Department established the setback distance restriction in condition 19.2 to protect the PSD increment for PM-10. The requirement for a dust control plan in condition 51.2 for operations within one mile of the nearest off site inhabited structure is based on predicted 24 hour impacts of the ambient standard for PM-10.

As previously noted in the 2003 GP3, the setback distance requirements are based on the best information available to the Department. They do not guarantee that an operation cannot violate the ambient air quality standards or increments, or create a public air quality nuisance. Therefore, the Department included a note that if the

⁴ It is important to note that most asphalt plants operating under the general permits did so without public complaints to the Department.

operation results in complaints, the complaints are subject to investigation. The note lists some of the possible outcomes of the investigation.

Condition 20 – Ambient Air Quality Protection from SO₂ Emissions – Additional Restrictions for Special Protection Areas

Legal Basis: This condition only applies to asphalt plants located in the SO₂ Special Protection Areas (Unalaska and Saint Paul Island areas) established in 18 AAC 50.025(c).

Factual Basis: The Department established the SO₂ Special Protection Areas due to past demonstrations that the ambient SO₂ air quality standards and increments are threatened. While developing the 2003 GP3, the Department conducted a modeling analysis to determine whether additional restrictions were needed to protect the standards and increments in these special protection areas. The analysis showed that the Asphalt Plant would need to operate with a fuel content not greater than 0.075 percent sulfur by weight and that the plant would need to operate on highline power rather than from its own diesel-generator. It also showed that if diesel engines are used for another purpose other than electrical power generation then they could not burn fuel with a sulfur content greater than 0.075 percent, by weight. The Department incorporated these restrictions into the 2003 GP3, and is now incorporating them into this general permit. If a Permittee would like less stringent restrictions when operating in an SO₂ Special Protection Area, they will need to obtain a source-specific permit. The application for a source-specific permit would need to include a case-specific ambient air quality modeling demonstration.

Condition 21 - Ambient Air Quality Protection from SO₂ Emissions – Additional Restrictions for Bells Flats (Kodiak)

Legal Basis: 18 AAC 50.010 establishes the ambient air quality standards in the State of Alaska. This condition only applies to Asphalt Plants that operate at the Bells Flats area of Kodiak Island.

Factual Basis: In response to complaints received from the Bells Flat area of Kodiak in circa-2003, the Department conducted a modeling analysis under 18 AAC 50.201 of Asphalt Plant operations in this area. The analysis showed that Asphalt Plant emissions should not violate the State's air quality standards/increments as long as the sulfur content of the liquid fuel did not exceed 0.4 percent (by weight) and the plant operated no more than 13 hours per day. The Department incorporated these limits in the 2003 GP3, and is now incorporating these same limits into this general permit. MR&R requirements are established under this condition.

Condition 22 - Open Burning

Legal Basis: The condition requires the Permittee to comply with the regulatory requirements when conducting open burning at the Stationary Source. This condition ensures compliance with the applicable requirement in 18 AAC 50.065. The open burning state regulation in 18 AAC 50.065 applies to the Permittee if the Permittee conducts open burning at the Stationary Source.

Factual Basis: The condition requires the Permittee to comply with the regulatory requirements when conducting open burning at the Stationary Source.

No specific monitoring is required for this condition. Condition 22.1f requires the Permittee to keep "sufficient records" to demonstrate compliance with the standards for conducting open burning, but does not specify what these records should contain.

More extensive monitoring and recordkeeping is not warranted because the Permittee does not conduct open burning as a routine part of their business. Also, most of the requirements are prohibitions, which are not easily monitored. Additional monitoring is achieved through conditions 22.9 and 53.3, which require a record of complaints.

Condition 23 - Standard for Particulate Matter for Hot Mix Asphalt Facilities

Legal Basis: This condition applies to hot mix asphalt facilities.

Factual Basis: NSPS Subpart I establishes standards for PM emissions for affected hot mix asphalt facilities.

Condition 24 – Performance Testing for New Asphalt Plants

Legal Basis: This condition applies because 40 C.F.R. 60 Subpart I requires an initial source test for Hot Mix Asphalt Facilities and because the State adopted Subpart I by reference in 18 AAC 50.040(a)(2)(I).

New Asphalt Plants are required to do an initial performance test within 60 days after achieving maximum production rate but not later than 180 days after initial startup.

Factual Basis:

40 CFR § 60.90 Applicability and designation of affected facility:

(a) The affected facility to which the provisions of this subpart apply is each hot mix asphalt facility. For the purpose of this subpart, a hot mix asphalt facility is comprised only of any combination of the following: dryers; systems for screening, handling, storing, and weighing hot aggregate; systems for loading, transferring, and storing mineral filler, systems for mixing hot mix asphalt; and the loading, transfer, and storage systems associated with emission control systems.

(b) Any facility under paragraph (a) of this section that commences construction or modification after June 11, 1973, is subject to the requirements of this subpart.

40 CFR 60.93 requires Asphalt Plants that were constructed, reconstructed, or modified after June 11, 1973 to conduct PM testing using Methods 5 and 9.

Conditions 25 – 34 – Compression Ignition (CI) Internal Combustion Engines (ICE)

Legal Basis: Apply if the facility operates an engine subject to the NSPS requirements of 40 C.F.R. Subpart IIII. These conditions ensure compliance with the applicable requirements of Subpart IIII.

Factual Basis: These conditions apply to the Permittee for new diesel engines as defined in 40 C.F.R. 60.4200.

These conditions specify the terms and requirements of 40 C.F.R. Subpart IIII and provide the monitoring, recordkeeping and reporting requirements.

Conditions 35 – 38 – Operation of Rock Crushers and Ancillary Equipment

Legal Basis: These conditions apply to a stationary source that operates a rock crusher and included it in the application or application addenda for the General Permit. These conditions apply to all rock crushers including those subject to 40 CFR Subpart OOO.

Rock crushers are industrial equipment and are subject to State regulations governing emissions, fugitive dust, siting considerations and general operations.

Factual Basis: The emission standard for rock crushing equipment including rock crushers, grinding mills, screening operations, bucket elevators, bagging operations and storage bins is applicable because the Department considers these types of equipment as part of an industrial process not specifically excluded by regulation.

The fugitive dust standard applies because it is required to be in all permits by regulation. The Standard Permit Condition X is applicable to this facility but additional restrictions were determined to be necessary to protect the public.

The monitoring, recordkeeping and reporting requirements for the visible emissions and particulate matter standards match in large those in the Minor General Permit for Rock Crushers (MG 9) issued on April 8, 2009.

Condition 38 is applicable to prevent public access to external air not meeting the Alaska Ambient Air Quality Standards. U.S. EPA guidance typically refers to a fence or physical boundary. Barring physical boundaries, the Department requires posting public access points with warning signs.

Conditions 39-41 – Subpart OOO — Standards of Performance for Nonmetallic Mineral Processing Plants

Legal Basis: An affected facility under paragraph 40 CFR §60.670(a) that commences construction, modification, or reconstruction after August 31, 1983, is subject to the requirements NSPS Subpart OOO.

Periodic monitoring requirements were also incorporated to comply with 40 CFR 71.6(a)(3)(B) to demonstrate compliance with the permit terms and conditions.

Factual Basis: 40 CFR 60 Subpart OOO provides the standards of performance for nonmetallic mineral processing plants. This general permit allows the operation of rock crushers and ancillary equipment that is subject to 40 CFR 60 Subpart OOO.

In addition to the applicable requirements under Subpart OOO, condition 40.8 was added in accordance with 40 CFR 71.6(a)(3)(B) for the Permittee to demonstrate compliance with the standard for particulate matter during the life of the permit.

Condition 42 – Pollution Control Equipment Maintenance Plan

Legal Basis: 18 AAC 50.055(a)(1) & (4), (b)(1) or (5) requires the Permittee to comply with visible emissions standards. 18 AAC 50.110 prohibits any emission which is injurious to human health, welfare or property, or which would unreasonably interfere with the enjoyment of life or property.

Factual Basis: Pollution control equipment must be maintained and serviced periodically. It is a reasonable requirement that the owner or operator develops and implements an adequate pollution control equipment maintenance plan to minimize equipment failure.

Condition 43 – Pollution Control Equipment Breakdown Reporting

Legal Basis: Under 18 AAC 50.326(j)(3), the Department requires the Permittee to report all pollution control device breakdowns. This carries over condition 39 of the prior 2003 GP3.

Factual Basis: Because of public complaints, the Department included this condition to better insure compliance with the conditions of this permit. Permittees will better assure compliance and minimize compliance by ensuring that the emission units are well maintained and pollution control equipment, if used, functions properly. This is an extension of Good Air Pollution Control Practices, condition 49.

Condition 44 – Relocation and Reporting Site Selection

Legal Basis: This relocation condition applies to all Asphalts Plants because Alaska Statute (AS) 46.14.210 authorizes the Department to issue a General Permit that is applicable to more than one Stationary Source similar in emission unit structure. The permit also contains siting requirements that limit the Asphalt Plant from operating within specified distances to occupied structures, and has monitoring requirements based upon startups at new locations.

This site selection condition applies to all Asphalts Plants because 18 AAC 50.110 prohibits pollution that is injurious to human health or welfare, animal or plant life or property, or which would unreasonably interfere with the enjoyment of life or property. This condition applies unless a stricter condition exists in this permit, State Statutes, or Federal Guidelines.

Factual Basis: Because of public complaints, the Department conducted air dispersion modeling to predict the impacts of Asphalt Plants on ambient air. Sources modeled were the stack emissions and fugitive dust emissions modeled as volume sources. Sources modeled were the stack emissions (as horizontal or vertical point sources), and fugitive dust emissions, modeled as volume sources. See Attachment 2 for a description of modeling performed. The new locations must comply with the distance requirements in conditions 19.1 – 19.2, give adequate consideration to the siting issues described in condition 19.3, comply with Coastal District Plan Designated Area Enforceable Policies in condition 45, and provide a dust control plan per condition 51.2 if within one mile of the nearest off site inhabited structure.

This location requirement is based on the best information available to the Department. It does not guarantee that an operation cannot violate ambient standards or cause violations against the prohibition of air pollution if the equipment is not properly run, or fugitive emissions are not controlled. Therefore, the condition also advises the Permittee that if the operation results in complaints, the complaints will be investigated. The condition lists some of the possible outcomes of the investigation.

Condition 45 – Alaska Coastal Management Program (ACMP)

Legal Basis: This condition applies to all Asphalt Plants because AS 46.14.120(d) requires permits comply with all applicable federal, state, and local requirements. The ACMP District Enforceable Policies are state requirements. The authority for ACMP is in 11 AAC 110, 11 AAC 112, and 11 AAC 114.

Factual Basis: The Department followed protocol for ACMP reviews and received one comment. This condition requires the Permittee to comply with local coastal policies and to report compliance with any policies that affect the Stationary Source. This condition only applies to Stationary Sources that are operating within an Alaska Coastal District. Conditions 44 and 70 address the reporting for this condition 45.

The milestones for the ACMP review are listed below.

On April 25 through May 5, 2008, the Department conducted a 10-day ACMP project scope request to solicit applicable enforceable policies from all Coastal District Coordinators in Alaska with enforceable policies for ACMP Consistency Review.

On May 5, 2008, the Department received responses from two coastal districts: the Aleutians West Coastal District and the City of Bethel. The Title-I Supervisor sent these to the Department's Deputy Commissioner on the same day.

On May 6, 2008, the Deputy Commissioner determined that the scope of the project potentially includes activities subject to the following local district enforceable policies: Bethel (CD-1 and CA-1); and Aleutians West CRSA (D, G-1, H (including H-1 and H-2), I (including I-1 and I-2)).

On June 9 through July 8, 2008, the Department conducted a 30-day ACMP public comment review for ACMP Consistency Review Packet (simultaneously with the public comment period for this general permit under 18 AAC 50.326(k)).

On July 8, 2008, the Department received comments from Karol Kolehmainen, Program Director for Aleutians West Coastal Resource Service Area (AWCRSA) Board of Directors.

On July 18, 2008, the Department issued a proposed consistency determination.

On July 24, 2008, the Department issued the final ACMP consistency determination.

Conditions 46 - Administration Fees

Legal Basis: This condition requires the Permittee, owner, or operator to pay administration fees as set out in regulation. Paying administration fees is required as part of obtaining and holding a permit with the Department or as a fee for a Department action.

Factual Basis: The owner or operator of a Stationary Source who is required to apply for a permit under AS 46.14.130 shall pay to the Department all assessed permit administration fees. The regulations in 18 AAC 50.400-405 specify the amount, payment period, and the frequency of fees applicable to a permit action.

Conditions 47 and 48 - Emission Fees

Legal Basis: The regulations require all permits to include due dates for the payment of fees and any method the Permittee may use to re-compute assessable emissions. This is Standard Permit Condition I under 18 AAC 50.346(b)(1), adopted into regulation pursuant to AS 46.14.010(e).

Factual Basis: These standard conditions require the Permittee to pay fees in accordance with the Department's billing regulations. The billing regulations set the due dates for payment of fees based on the billing date.

The default assessable emissions are emissions of each air pollutant authorized by the permit (AS 46.14.250(h)(1)(A)). Air pollutant means any regulated air pollutant and any hazardous air pollutant. Therefore, assessable emissions under AS 46.14.250(h)(1)(A) means the **potential** to emit any air pollutant identified in the permit, including those not specifically limited by the permit. For example, hydrogen chloride (HCl) emissions from an incinerator are assessable emissions because they are a hazardous air pollutant, even if there is currently no emission limit on HCl for that class of incinerator.

The Department modified the standard condition to correct condition 48.1 such that it referenced “submitted” (i.e., postmarked) rather than “received” in accordance with the timeframe of the condition.

The conditions also describe how the Permittee may calculate **actual** annual assessable emissions based on previous actual annual emissions. According to AS 46.14.250(h)(1)(B), assessable emissions are based on each air pollutant. Therefore, fees based on actual emissions must also be paid on any pollutant emitted whether or not the permit contains any limitation of that pollutant.

This standard condition specifies that, unless otherwise approved by the Department, calculations of assessable emission based on actual emissions use the most recent previous calendar year's emissions. Since each current year's assessable emission are based on the previous year, the Department will not give refunds or make additional billings at the end of the current year if the estimated emissions and current year actual emissions do not match. The Permittee will normally pay for actual emissions - just with a one-year time lag.

Projected actual emissions may differ from the previous year's actual emissions if there is a change at the Stationary Source, such as changes in equipment or an emission rate from existing equipment.

The emission factors in the Asphalt Plant Emission Calculation Guide are taken from US EPA publication AP-42 *Compilation of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources, Fifth Edition* as adopted by reference in 18 AAC 50.035.

The Permittee may use other emission factors as outlined in Asphalt Plant Emission Calculation Guide and Standard Permit Condition I provided those emission factors have been approved by the Department.

If the Permittee does not choose to annually calculate assessable emissions, emissions fees will be based on “potential to emit” (PTE).

The PTE set forth in the condition is based on liquid fuel with a sulfur content of 0.5 percent by weight or fuel gas with a sulfur content of 60 ppm H₂S by volume. If the actual sulfur content of the fuel is greater than these assumptions, the assessable emissions calculations provided by the Permittee should reflect the actual sulfur content. The change in these values may result in SO₂ emissions that could trigger PSD.

The address to submit Emission Fee Estimates was changed from the Standard Permit Condition. This address was changed to reflect the processing center for Emission Fee Estimates.

Condition 49 - Good Air Pollution Control Practices

Legal Basis: This condition ensures compliance with the applicable requirements under 18 AAC 50.346(b)(5) *Standard Operating Permit Condition VI - Good Air Pollution Control Practices* and applies to all emission units, **except** those subject to federal emission standards.

Factual basis: The condition requires the Permittee to comply with good air pollution control practices for all emission units. The permit contains the provision exactly as required by regulation. This is the same as 18 AAC 50.346(b)(5) and requires that all permits issued by the State of Alaska contain the provisions of Standard Operating Permit Condition VI – Good Air Pollution Control Practices unless more specific requirements adequately meet the requirements. In this case the Department has included in the permit more specific requirements as follows.

Condition 49.2 - Facilities with a Baghouse

Legal Basis: This condition expands the requirements under 18 AAC 50.346(b)(5) *Standard Operating Permit Condition VI - Good Air Pollution Control Practices* to provide a condition that more adequately meets the requirements under 18 AAC 50.346(b)(5) when the control device is a baghouse. This condition is the same monitoring as condition 18 of the prior GP3 general permit with added recordkeeping and reporting.

Factual Basis: The permit requires the Permittee to demonstrate compliance with the visible emissions and particulate matter standards in 18 AAC 50.055. Some Asphalt Plants may choose to control PM emission using a baghouse. This condition states the minimum frequencies for baghouse inspections, requires that the Permittee monitor the pressure drop across the baghouse, and baghouse outlet temperature, and maintain these parameters within limits recommended by the manufacturer.

After a run is completed, the baghouse temperature will drop through the range where acid gasses will condense. Corrosion will be minimized if the temperature passes through this range as quickly as possible. Therefore this requirement is to maintain fan operation per the manufacturer’s recommendation until the baghouse has been purged. Reducing corrosion will lengthen the life of the baghouse and maintain the integrity of the fabric filter clamps and fasteners.

Ongoing monitoring of the parameters mentioned in this condition such as the pressure drop across the baghouse enables the operators to determine how the baghouse is functioning. For example, a baghouse differential pressure (DP) higher than the manufacturer's maximum recommended values may indicate that the cleaning system is not functioning adequately or may indicate a blocked hopper. A DP significantly lower than the manufacturer's specifications could indicate holes in the bags.

Condition 49.3 - Facilities with a Wet Scrubber

Legal Basis: This condition expands the requirements under 18 AAC 50.346(b)(5) *Standard Operating Permit Condition VI - Good Air Pollution Control Practices* to provide a condition that more adequately meets the requirements under 18 AAC 50.346(b)(5) when the control device used is a wet scrubber. This condition is the same monitoring as condition 19 of the prior GP3 general permit with added recordkeeping and reporting.

Factual Basis: The permit requires the Permittee to demonstrate compliance with the visible emissions and particulate matter standards in 18 AAC 50.055. Some Asphalt Plants may choose to control PM emission using a wet scrubber. This condition states the inspection requirements at the beginning of the operating season if the particulate matter control device is a scrubber.

The Permittee must maintain and operate the scrubber in accordance with the manufacturer's recommendations to include pressure drop, inlet and outlet water temperatures, water flow rate, and water pressure. This condition is intended to support compliance with opacity and particulate standards by encouraging proper scrubber maintenance and operation. Scrubber efficiency is related to proper operation.

Condition 50 - Dilution

Legal Basis: This condition prohibits the Permittee from using dilution as an emission control strategy as set out in 18 AAC 50.045(a). This state regulation applies to the Permittee because the Permittee is subject to emission standards in 18 AAC 50.

Factual Basis: The condition prohibits the Permittee from diluting emissions as a means of compliance with any standard in 18 AAC 50.

Condition 51 – Reasonable Precautions to Prevent Fugitive Dust

Legal Basis: This condition expands the requirements under 18 AAC 50.346(c) *Standard Operating Permit Condition X – Reasonable Precautions to Prevent Fugitive Dust* to provide a condition that more adequately meets these requirements given the significant sources of fugitive dust that may be generated by the Stationary Source. This condition applies to stationary sources operating asphalt plants and/or rock crushers.

Factual Basis: The condition requires the Permittee to comply with 18 AAC 50.045(d), and take reasonable action to prevent particulate matter (PM) from being emitted into the ambient air. 18 AAC 50.045(d) requires an operator to

take reasonable precautions to prevent fugitive dust when handling bulk materials. This condition lists examples of reasonable precautions.

This condition requires the Permittee to use reasonable precautions when handling, storing or transporting bulk materials or engineering in an industrial activity in accordance with the applicable requirement in 18 AAC 50.045(d). Bulk material handling requirements apply to the Permittee because the Permittee will engage in bulk material handling, transporting, or storing; or will engage in industrial activity at the Stationary Source.

Asphalt Plants have a considerable potential for generating fugitive dust. 18 AAC 50.045(d) requires an operator to take reasonable precautions to prevent fugitive dust when handling bulk materials. The condition lists examples of reasonable precautions.

If the Asphalt Plant is to be located within one mile of a business, residence or other inhabited structure, the Permittee under this general permit must implement the plan under condition 51.2 or get the Department's approval to implement a different plan. The plan must be specific to any location named in the application.

The "one mile" distance requirement came from a circa-2003 dispersion modeling analysis conducted in support of the 2003 previous General Permit (GP3) for Asphalt Plants. Modeling predicted that during dry conditions, if precautions are not taken to control emissions from fugitive sources, the 24-hour PM-10 ambient air quality standard could be violated up to a mile away.

The "2,000 feet" distance requirement was derived from air dispersion modeling analysis performed by the Department on April 24, 2003. 2,000 feet between ambient air and crushing operations corresponded to a worst case scenario where 24-hour ambient air standard for particulate matter less than 10 microns could potentially be violated.

This condition also expands the requirements under 18 AAC 50.346(c) *Standard Condition X – Reasonable Precautions to Prevent Fugitive Dust* to provide a condition that more adequately meets the requirements under 18 AAC 50.346(c) given that significant fugitive dust can be generated from rock crushers.

Condition 52 - Stack Injection

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.045(e)-(f). It prohibits the Permittee from releasing materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack (i.e. disposing of material by injecting it into a stack). Stack injection requirements apply to the Stationary Source because the Stationary Source contains a stack or source constructed or modified after November 1, 1982.

Factual Basis: No specific monitoring for this condition is practical. Compliance is ensured by inspections, because the source or stack would need to be modified to accommodate stack injection.

Conditions 53 and 53.1 - Air Pollution Prohibited

Legal Basis: These conditions ensure compliance with the applicable requirement in 18 AAC 50.110. The conditions prohibit the Permittee from causing any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property. Air Pollution Prohibited requirements apply to the stationary source because the stationary source will have emissions.

Factual Basis: While the other permit conditions and emissions limitation should ensure compliance with this condition, unforeseen emission impacts can cause violations of this standard. These violations would go undetected except for complaints from affected persons. Therefore, to monitor compliance, the Permittee must monitor and respond to complaints.

ADEC adopted this standard condition into 18 AAC 50.346(a) pursuant to AS 46.14.010(d). The Department determined that this condition adequately meets the requirements of 40 C.F.R. 71.6(a)(3).

The Permittee is required to report any complaints and injurious emissions. The Permittee must keep records of the date, time, and nature of all complaints received and summary of the investigation and corrective actions undertaken for these complaints, and to submit copies of these records upon request of the Department.

Condition 54 – Asbestos NESHAP

Legal Basis: The condition requires the Permittee to comply with asbestos demolition or renovation requirements in 40 C.F.R. 61, Subpart M. This condition ensures compliance with the applicable requirement in 18 AAC 50.040(b)(1) and (2)(F). The asbestos demolition and renovation requirements apply if the Permittee engages in asbestos demolition or renovation.

Factual Basis: Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with these federal regulations.

Condition 55 – Refrigerant Recycling and Disposal

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.040(d) and applies if the Permittee engages in the recycling or disposal of certain refrigerants. The condition requires the Permittee to comply with the standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F that will apply if the Permittee uses certain refrigerants.

Factual Basis: Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with this federal regulation.

Condition 56 - Requested Source Tests

Legal Basis: Applies because this is a standard condition to be included in all permits.

Factual Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.220(a) and applies because this is a standard condition to be included in all operating permits under 18 AAC 50.345(k). Monitoring consists of conducting the requested source test.

Conditions 57 – 59 - Operating Conditions, Reference Test Methods, Excess Air Requirements

Legal Basis: These conditions apply because the Permittee is required to conduct source tests, and also ensures compliance with 18 AAC 50.220(b) – (c).

Factual Basis: These conditions supplement the specific monitoring requirements stated elsewhere in this permit. Compliance monitoring with these conditions consist of the test reports required by condition 64.

Condition 60 - Test Exemption

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.345(a) and applies when the source exhaust is observed for visible emissions.

Factual Basis: As provided in 18 AAC 50.345(a), amended May 3, 2002, the requirements for test plans, notifications and reports do not apply to visible emissions observations by smoke readers, except in connection with required particulate matter testing.

Conditions 61 – 64 - Test Deadline Extension, Test Plans, Notifications, and Reports

Legal Basis: These conditions ensure compliance with the applicable requirement in 18 AAC 50.345(l)-(o) and applies because the Permittee is required to conduct source test by this permit.

Factual Basis: Standard conditions 18 AAC 50.345(l) - (o) are incorporated through these conditions. These standard conditions supplement specific monitoring requirements stated elsewhere in this permit. The source test itself monitors compliance with these conditions.

Condition 65 - Recordkeeping Requirements

Legal Basis: Applies because the Permittee is required by the permit to keep records to demonstrate compliance with the terms and conditions of the permit and regulations.

Factual Basis: The condition restates the regulatory requirements for recordkeeping and supplements the recordkeeping defined for specific conditions in the permit. The records being kept provide an evidence of compliance with this requirement.

Condition 66 - Information Requests

Legal Basis: This condition requires the Permittee to submit requested information to the Department. This is a standard condition from 18 AAC 50.345(i) of the state approved operating permit program effective November 30, 2001.

Factual Basis: This condition requires the Permittee to submit information requested by the Department. Monitoring consists of receipt of the requested information.

Condition 67 - Submittals

Legal Basis: This condition requires the Permittee to comply with standardized reporting requirement in 18 AAC 50.326(j) and applies because the Permittee is required to send reports to the Department.

Factual Basis: This condition lists the Department's appropriate address for reports and written notices. Receipt of the submittal at the correct Department office is sufficient monitoring for this condition. This condition supplements the standard reporting and notification requirements of this permit.

Condition 68 - Certification

Legal Basis: This condition requires the Permittee to comply with the certification requirement in 18 AAC 50.205 and applies to all Permittees under EPA's approved permit program of November 30, 2001.

Factual Basis: This standard condition is required in all operating permits under 18 AAC 50.345(j).

This condition requires the Permittee to certify any permit application, report, affirmation, or compliance certification submitted to the Department. To ease the certification burden on the Permittee, the condition allows the excess emission reports to be **certified** with the Stationary Source report, even though it must still be **submitted** more frequently than the Stationary Source operating report. This condition supplements the reporting requirements of this permit.

Condition 69 - Excess Emission and Permit Deviation Reports

Legal Basis: This condition requires the Permittee to comply with the applicable requirement in 18 AAC 50.235(a)(2) and 18 AAC 50.240. Also, the Permittee is required to notify the Department when emissions or operations deviate from the requirements of the permit.

Factual Basis: This condition satisfies two state regulations related to excess emissions - the technology-based emission standard regulation and the excess emission regulation. Although there are some differences between the regulations, the condition satisfies the requirements of each regulation.

The Department adopted this condition as Standard Operating Permit Condition III under 18 AAC 50.346(c) pursuant to AS 46.14.010(d). The Department determined that this standard condition adequately meet the requirements of 40 CFR 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these

requirements. Therefore, the Department concluded that the standard conditions meet the requirements of 40 CFR 71.6(a)(3). The Department made a correction to the Standard Operating Permit Condition III to allow identical reporting methodology for both Excess Emissions and Permit Deviations reports which use identical forms and should have identical submissions methods.

Section 13: ADEC Notification Form

The Department modified the notification form contained in Standard Permit Condition IV in a revised rulemaking dated August 20, 2008 to more adequately meet the requirements of Chapter 50, Air Quality Control. The modification consisted of correcting typos and moving failure to monitor/report and recordkeeping to the permit deviations Section 2.

Condition 70 - Operating Reports

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.346(b)(6) and applies to all permits.

Factual Basis: The condition restates the requirements for reports listed in regulation. The condition supplements the specific reporting requirements elsewhere in the permit. The reports themselves provide monitoring for compliance with this condition.

The Department used the Standard Permit Condition VII as adopted into regulation on August 20, 2008. For reporting, MR&R conditions are Standard Permit Condition VII adopted into regulation pursuant to AS 46.14.010(d). The Department determined that these standard conditions adequately meet the requirements of 40 CFR 71.6(a)(3)(iii)(A). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard conditions meet the requirements of 40 CFR 71.6(a)(3).

Condition 71 - Annual Compliance Certification

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.040(j)(4) and applies to all Permittees.

Factual Basis: This condition specifies the periodic compliance certification requirements, and specifies a due date for the annual compliance certification. Each annual certification provides monitoring records for compliance with this condition.

Condition 71.3 provides clarification of transition periods between an expiring permit and a renewal permit to ensure that the Permittee certifies compliance with the permit terms and conditions of the permit that was in effect during those partial date periods involved in the transition. No format is specified: the Permittee may provide one report certifying compliance with each permit term or condition and the effective permit at that time, or may chose to provide two reports – one certifying compliance with permit terms and conditions from January 1 until the date of expiration of the old permit, and a second report certifying compliance with terms and conditions in effect from the effective date of the renewal permit until December 31.

The Permittee may submit one of the required copies electronically at their discretion. This change more adequately meets the requirements of 18 AAC 50 and agency needs, as the Department can more efficiently distribute the electronic copy to staff in other locations.

Attachment 4 was provided for the Permittee as a guide in completing and submitting the Annual Compliance Certification. While every effort was made to ensure that Attachment 4 incorporates all the conditions in the permit, it does not alleviate the Permittee from certifying compliance with all the required permit conditions as required by the permit.

Condition 72 - NSPS and NESHAP Reports

Legal Basis: The Permittee is required to provide the federal administrator and Department a copy of each emission unit report for units subject to NSPS or NESHAP federal regulations under 18 AAC 50.326(j)(4). 40 CFR 70 Appendix A documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: The condition supplements the specific reporting requirements in 40 C.F.R. 60, 40 C.F.R. 61, and 40 C.F.R. 63. The reports themselves provide monitoring for compliance with this condition.

Condition 73 - Nonroad Engines

Legal Basis: Nonroad engines are not subject to the standards approved under the State Implementation Plan for the air pollution control for Stationary Sources. Furthermore, 18 AAC 50.100, states that the potential to emit from nonroad engines do not count towards classification of a Stationary Source or modification under AS 46.14.130.

Factual Basis: This condition requires the Permittee to keep records of location and specifications of nonroad engines at any location where they operate. A nonroad engine has the meaning given in 40 C.F.R. 89.2. An engine will not be considered a nonroad engine if it remains at or will remain at a location for more than 12 consecutive months. An engine used at a single specific location for 12 months or longer ceased to be a nonroad engine when it was placed in that location.

Conditions 74 – 80 – Compliance Terms to Make Permit Enforceable

Legal Basis: These are standard conditions required under 18 AAC 50.345(a) – (h) for all operating permits.

Factual Basis: These are standard conditions for compliance required for all operating permits.

Condition 81 - Permit Renewal

Legal Basis: The Permittee must submit a timely and complete operating permit renewal application if the Permittee intends to continue source operations in accord with the operating permit program under 18 AAC 50.326(j)(3). The obligations for a timely and complete operating permit application are set out in 40 CFR 71.5 incorporated by reference in 18 AAC 50.040(j)(3). 40 CFR 70 Appendix A

documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: In accordance with AS 46.14.230(a), this operating permit is issued for a fixed term of five years after the date of issuance, unless a shorter term is requested by the permit applicant. The Permittee is required to submit an application for permit renewal by the specific dates applicable as listed in this condition. As stated in 40 CFR 71.5(a)(1)(iii), submission for a permit renewal application is considered timely if it is submitted at least six months but no more than eighteen months prior to expiration of the operating permit. According to 71.5(a)(2), a complete renewal application is one that provides all information required pursuant to 40 CFR 71.5(c) and must remit payment of fees owed under the fee schedule established pursuant to 18 AAC 50.400. 40 CFR 71.7(b) states that if a source submits a timely and complete application for permit issuance (including renewal), the source's failure to have a permit is not a violation until the permitting authority takes final action on the permit application.

Therefore, for as long as an application has been submitted within the timeframe allowed under 40 CFR 71.5(a)(1)(iii), and is complete before the expiration date of the existing permit, then the expiration of the existing permit is extended and the Permittee has the right to operate under that permit until the effective date of the new permit. However, this protection shall cease to apply if, subsequent to the completeness determination, the applicant fails to submit by the deadline specified in writing by the Department any additional information needed to process the application. Monitoring, recordkeeping and reporting for this condition consist of the application submittal.

Condition 82 - 83 - Permit Applications

Legal Basis: These conditions set out the protocol the Permittee must follow to submit amendment, modification and renewal applications to the Department under 18 AAC 50.326(j)(3) and to the Federal Administrator under 40 CFR 71.5, 71.7 and 71.10.

Factual Basis: This condition directs the Permittee to submit application materials to the Department's Anchorage office. The current address at time of permit issuance is provided in a footnote because it may change during the life of this permit. The current address can be obtained by contacting the Department, checking the website, or by other reasonable means. The Permittee may submit copies of application materials in electronic formats compatible with ADEC software as the Department can more efficiently distribute the electronic copy to staff in other locations. Condition 83 directs the applicant to send copies of all application materials directly to the EPA, in electronic format if practicable.

Attachment 1: Emission Reporting and Emission Fee Estimate

Submit the following information to the Department no later than March 31st of each year at:

ADEC Air Permits Program
610 University Avenue
Fairbanks, AK 99709- 3643

Or

FAX to (907) 451-2187

Or

Email to: DEC.AQ.Airreports@alaska.gov
(if emailed, the report must be signed and certified in accordance with 18 AAC 50.345(j).)

Or

Submit emissions online at the following website:
<https://myalaska.state.ak.us/deca/air/airtoolsweb>

Stationary Source Name; _____

Permit Number: _____ Date: _____

Emission Fee Estimate for _____
(State fiscal year)

Table 1 Total Emissions & Assessable Emission Fee Estimate

Pollutant	Asphalt Plant	Diesel Engine(s)	Rock Crusher (if Applicable)	Assessable Emissions
NO _x				
CO				
SO ₂				
PM-10				
VOC				

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Signature

Printed Name

Title

Attachment 2: Asphalt Plant Dispersion Modeling Summary

Alaska Department of Environmental Conservation Dispersion Modeling Summary For Asphalt Plants

Prepared by
Bill Walker
April 23, 2003

This summary is to support the renewal of general air quality operating permits for Asphalt Plants. The Department specifically requests comment on the assumptions used to characterize these facilities, and on how we should use the information produced by the modeling analysis.

Background

On May 1, 1998, the Department issued permits for transportable or stationary Asphalt Plants. The first round permits were issued under the authority of AS 46.14.215 which requires a demonstration that operations do not cause violations of ambient air quality standards or applicable increments. In support of that permit, the Department did air quality dispersion modeling using SCREEN3⁵.

During the life of that permit, the Department has received a substantial number of complaints about emissions from some of the Asphalt Plants using the General Permit. The complaints involve the potential for adverse impacts on human health and welfare.⁶ The complaints were about dust and odors, and specifically questioned whether the Department has evaluated the effects of neighbors being on elevated terrain, and the operation of more than one industrial facility at the same location.

The modeling for the 1998 permits did not look at either elevated terrain or multiple industrial operations at one location. At that time, the Department also did not have a way to estimate emissions from any sources other than the stack emissions from aggregate dryers, drum mixers, or diesel engines used to provide electrical power. Therefore, several important sources of particulate matter were not part of the analysis.

The Department is issuing the renewal permits under the authority of AS 46.14.210, but not AS 46.14.215. However, because of public health concerns that arose during the life of the original permits, I have done additional dispersion modeling as provided by 18 AAC 50.201. This modeling serves as the basis for proposed permit conditions.

⁵ SCREEN3 AND ISCST3 are EPA computer models for predicting concentrations of pollutants in the air to which the public has access. They use data on weather and on the emission sources to make the calculations.

⁶ It is important to note that most plants operating under the general permits did so without public complaints to the department.

Model and Methods Used

For this modeling analysis I used ISCST3¹. This allowed sources to be distributed over a three dimensional space. [SCREEN3 does not.] The modeling is intended to represent Asphalt Plants operating anywhere in the state. To make the modeling as representative as possible, I used emission rates and stack parameters from 28 Asphalt Plant source test reports. I estimated stack heights from photographs or visible emission inspection [Method 9] reports. Source test reports show operation at rates both above and below the standard of 0.04 gr/dscf. Emission rates for all stacks modeled were based on operation at that standard.

Fugitive particulate matter emissions were modeled as volume sources as this best approximates how they are released.

Meteorological Data

The meteorological data set was a screening data set similar to the one used in SCREEN3. It was applied to ISCST3 by Pat Hanrahan of the State of Oregon Department of Environmental Quality. The model predicted one hour ambient concentrations. To get 24 hour concentrations, I multiplied the results by 0.4, and for three hour concentrations multiplied by 0.9. This is consistent with EPA guidelines.

Background Concentrations

The background concentrations selected must be applied statewide. It would be far too unwieldy to develop separate conditions for each area of the state based on different background concentrations. I used the highest concentrations measured at Healy. The location of the Healy monitoring site intended to gather background concentrations, not to measure impacts from the Healy power plants. The background concentrations were:

- SO₂ 24 hour – 26 µg/m³;
- SO₂ three hour – 44 µg/m³;
- PM-10 24 hour – 31 µg/m³.

Receptors

Receptors were placed using a polar grid from a few meters from the center of the operation to a maximum of 2000 meters. Receptors were modeled assuming flat terrain, and terrain heights of 10, 15, and 20 meters.

Downwash

Asphalt Plants have several structures that can cause downwash under some circumstances. The modeling used two structures common to any plant. The dryer or drum mixer was represented as a building 30 feet long and 12 feet high. Drum mix plants have a storage silo. Batch plants have a pug mill, and may also have a storage silo. To represent a silo or pug mill, I used a cylindrical structure 40 feet high and 14 feet in diameter.

Earlier modeling done before the public workshops held in January, 2003 relied on only one downwash structure – the drum mixer or dryer. A photograph the Department received of one Asphalt Plant in operation shows apparent downwash from larger

structures. Based on that information adding the silo was more realistic and produced changes in the modeling results.

PM-10

A recent EPA publication⁷ provided estimates of fugitive emissions for:

- Dust from vehicle traffic, including dump trucks and loaders;
- Receiving new aggregate;
- RAP crushing;
- Screening;
- Load out; and
- For drum mix plants, silo filling.

I combined all modeled sources in three scenarios – high and low moisture for fugitive emissions, and assuming fugitive emissions from mobile sources was controlled well enough that emissions are negligible. Asphalt plant stack emissions were modeled at the NSPS emission limit of 0.04 gr/dscf for each scenario.

The estimated emissions from vehicle traffic, RAP crushing, and screening depend on whether there are emission controls, such as water sprays, and for vehicle traffic, whether the ground is wet or dry and dusty and the soil silt content. Emissions from these sources also depend on the production rates and other source specific factors. I used the emission factors and assumptions in the following table.

⁷ Hot Mix Asphalt Plant Emission Assessment Report, EPA-454/R-00-019, December, 2000.

Table 1 Fugitive Particulate Matter Emission Factors and Assumptions			
Emission Source	PM-10 Emission Factor	Source of Emission Factor	Assumptions
All Sources			12 hours of operation per day 150 tons of HMA per hour
Loaders	$E = 2.6 (s/12)^{0.8} \times (W/3)^{0.4} \times 1/(M/0.2)^{0.3}$ where s is ground silt content W is vehicle weight M is soil moisture E is pounds of PM-10 /vehicle mile traveled	AP-42 Table 13.2.2	Caterpillar 928g Loader 12 ¼ tons 3 yard bucket capacity 20 feet from aggregate pile to inlet hopper Soil Moisture - uncontrolled operation 0.7% ⁴ - controlled operation 20% 10% road silt ⁸
Trucks	Same as loaders	Same as Loaders	10 ½ tons empty 12 ton capacity 200 meters from gravel source to dryer 50 meters to property boundary Soil Moisture - for uncontrolled operation - 0.7% ⁴ - no emissions when wet 10% road silt ⁴
Screening	Controlled - 0.00084 Uncontrolled – 0.015 lb/ton	AP-42 11.19.2	
RAP Crushing	Controlled – 0.00059 Uncontrolled – 0.0024	AP-42 11.19.2	Factor for tertiary crushing ⁴

Results

The model predicted ambient air quality standards violations for each terrain height. For each model run I found the distance from the center of the operation to the nearest receptor with predicted compliance with the ambient standards. For conclusions based on particulate matter emissions, I subtracted 50 meters, which was the distance from the center to the outer edge of the volume sources representing fugitive emissions.

⁸ Hot Mix Asphalt Plant Emission Assessment Report, EPA-454/R-00-019, December, 2000, page 15

GP3 – Asphalt Plant General Permit

The distances to compliance were much greater for the model runs with fugitive emission sources uncontrolled. Distances were 1400 - 1600 meters – about one mile.

[Modeling filenames: dwas00su, dwas30su]

For controlled fugitive sources, the model predicts ambient standards violations only at smaller distances from the operation (see Table 2 below). With the same assumptions, the model also predicts violations of PSD increments at distances closer than 800 feet for flat terrain, and 1100 feet for terrain that is elevated 15 meters above the ground level of the stationary equipment.

[Modeling filenames: dwas00mc, dwas20mc]

Table 2 PM-10	
	Distance to Compliance with ambient standard– all asphalt plants modeled comply at rated capacity [distance in meters, measured between an offsite inhabited structure and a Stationary Source or material piles or borrow source that is being actively worked.
Worst Case All sources – Fugitives uncontrolled, dry conditions 0 meters terrain height	1550 meters
Best Case Fugitive emissions negligible except for RAP crushing and load out emissions 0 meter terrain ht. 10 meter 15 meter 20 meter	26 49 64 84

SO₂

All sulfur emissions are assumed for this modeling to originate from sulfur in the fuel. I used the actual fuel combustion rate during the source test from which I obtained the stack parameters, and assumed the sulfur content of the fuel was 0.5% sulfur (the ASTM specification for number 2 diesel or fuel oil.) I assumed the simultaneous use of a stationary 500 hp diesel engine.

SO₂ standards were predicted to violate the three hour ambient standard close to the facility. The greatest distance for any plant modeled (flat terrain) to a location where compliance with the standard was always predicted was 100 meters, or 110 yards from the combustion sources. [Combustion sources were modeled as point sources emitted at a single location.] Modeling for most other plants predicted distances to compliance between 50 and 100 yards.

[Modeling filename: soadas00]

Multiple Industrial Facilities at One Location

I modeled the combined impacts of an asphalt plant and a crusher located 100 meters apart. I modeled all crusher sources using AP-42 emission factors for controlled sources, and an asphalt plant assuming that all fugitive emission sources except RAP crushing and load out emissions were controlled well enough to be negligible. Impacts did not exceed those when the same sources were modeled separately. Therefore no permit conditions are included in the proposed permit to address emissions from combined sources.

Conclusions and Recommendations

Because the modeling that was performed relies on estimates of what is a “typical” facility, the conditions in the permit based on this modeling of the results are not as rigorous as would be done for modeling which more accurately represents an individual facility. A General Permit is necessary because of the nature of asphalt production operations in Alaska. Asphalt Plants may have to frequently relocate to be near enough to road or runway paving jobs. By the time a contract is awarded and a location identified, there is typically not enough time to obtain a facility specific permit and still be able to satisfy the contract.

Based on results for SO₂ the permit prohibits locating fuel burning equipment at an asphalt plant within 110 yards of a residence.

The worst case modeling for uncontrolled particulate matter sources predicts violations of the 24 hour ambient PM-10 standard up to a mile away. The permit condition to address this possibility relies on a fugitive dust control plan. It would not be possible to write conditions that adequately restrict emissions from all sources without being overly stringent in many cases.

Based on results for PSD increments, the permit allows up to two years of operation at a location that is closer than 800 feet to a residence or other occupied structure, or 1100 feet if the structure is on terrain higher than 10 meters above the ground level of the stationary equipment. Construction activities that are in one location for less than two years are considered temporary, and not subject to PSD increments.

Uncertainties

Each of the assumptions described contributes uncertainty to the results of this analysis. Since there is no one set of assumptions that will fit all operations, the intent was to

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describe a reasonable worst case—assumptions that would not unreasonably prevent the operation under this permit of asphalt plants that have been operating under the previous permit without problems or complaints.

Since the General Permits can be used anywhere in the state, there is no one set of meteorological data that would be appropriate for all operations. This is why I chose a “screening” data set that presents a wide variety of conditions to find the reasonable worst case one hour concentration. The predictions would be appropriate to the extent that these screening conditions fit any actual location for an extended number of hours, the wind direction is toward nearby structures such as businesses or residences, and operation occurs during these conditions for about 12 hours per day.

These uncertainties must be considered when applying the modeling results to any applicability criteria or permit conditions for the General Permit.

Odor

The odor from asphalt plants is a common source of concern to nearby residents, especially those with special health problems. However, odor cannot be modeled, so it could not be included in this analysis.

Attachment 3: Rock Crusher Dispersion Modeling Summary

Alaska Department of Environmental Conservation Dispersion Modeling Summary For Rock Crushers

Prepared by
Bill Walker
April 24, 2003

This summary is to support the renewal of general air quality operating permits for rock crushers. The Department specifically requests comment on the assumptions used to characterize these facilities, and on how we should use the information produced by the modeling analysis.

Background

On April 14, 1998, the Department issued a general permit for transportable or stationary rock crushers. The first round permits were not supported by dispersion modeling.

During the life of that permit, the Department has received complaints about emissions from rock crushing operations. The complaints involve the potential for adverse impacts on human health and welfare.⁹

The Department is issuing the renewal permits under the authority of AS 46.14.210, but not AS 46.14.215. However, because of public health concerns that arose during the life of the original permits, I have done dispersion modeling as provided by 18 AAC 50.201. This modeling serves as the basis for proposed permit conditions.

Model and Methods Used

For this modeling analysis I used ISCST3. This allowed sources to be distributed over a three dimensional space. Emissions are modeled as volume sources based on photographs of a rock crushing operation. I took emission rates from AP-42 for crushers, screens, conveyors and diesel engines.

Meteorological Data

The meteorological data set was a screening data set similar to the one used in SCREEN3. It was applied to ISCST3 by Pat Hanrahan of the State of Oregon Department of Environmental Quality. The model predicted one hour ambient concentrations. To get 24 hour concentrations, I multiplied the results by 0.4. This is consistent with EPA guidelines.

⁹ It is important to note that most plants operating under the general permits did so without public complaints to the Department.

Background Concentrations

Background concentrations had to be applied statewide. I used the highest concentrations measured at Healy. The location of the Healy monitoring site intended to gather background concentrations, not to measure impacts from the Healy power plants. The background concentration was:

- PM-10 24 hour – 31 micrograms/m³.

Receptors

Receptors were placed using a polar grid from a few meters from the center of the operation to a maximum of 2000 meters. Receptors were modeled assuming flat terrain, and terrain heights of 10, 15, and 20 meters.

Downwash

I used one downwash structure based on one of the crusher operation photographs. It approximates a crusher and screen mounted on a trailer bed. The dimensions are 40 feet long by 12 feet high by 8 feet wide.

PM-10

I modeled crushers, screens, and conveyors as one volume source 120 feet square, and 5 meters tall (estimated from crushing operation photographs).

Emission factors came from EPA's AP-42, Table 11.19.2-2 for crushed stone processing operations. Activity rates were based on 127 tons per hour (tph), as follows:¹⁰

- 127 tph in initial crusher
- 127 tph in initial screen
- ½ to second crusher and second screen
- ½ of that to tertiary crusher and recycle back to second screen

I used two other volume sources, one for unpaved road dust from loader operation, and the other from AP-42 13.2.4 for drop operations from the final processing to the storage piles.

Again from crusher operation photograph, I assumed the use of two 500 hp diesel engines (modeled as point sources). I selected 500 hp from the power requirement for a Pioneer cone crusher similar to the Spokane crusher in the photograph.

Emission factors were all based on 24 hours of operation per day, but I used a scaling factor to adjust results to 12 hours per day.

I did best and worst case modeling. The best case assumed that road dust is controlled well enough to be minimal. I used EPA's emission factors for controlled sources or factors calculated based on high moisture content. For the worst case option, I used emission factors for uncontrolled sources, or factors calculated assuming high road surface silt content and low moisture. Emission factors for diesel engines did not change.

With best case assumptions, modeling predicted compliance with the 24 hour PM-10 standard at 130 meters from the center of the operation and beyond [rounded to 400 feet

¹⁰ 127 tons per hour was the same activity rate used for modeling asphalt plant. It is based on 150 tons per hour of hot mix asphalt

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from the edge of the operation], and with the increment at 350 meters and beyond [rounded to 1000 feet].

The worst case assumptions for fugitive emissions predicted that the ambient standard could be violated at a much greater distance from the crushing operation [700 meters – rounded to 2000 feet from the edge of the operation]. There is no set of limitations or practices to control fugitive dust that the permit could impose that would be both reasonable and effective in all cases. Therefore, the permit uses results from worst case modeling for requiring a dust control plan. If a crushing operation is within the 2000 feet of a residence or other occupied structure, the application must contain a site specific dust control plan, and the operator must comply with that plan.

Modeling at elevated terrain heights did not change any of these distances.

[Filesnames: crushrco.bst, crushrun.bst]

Attachment 3: Semiannual Operating Report

Submit the following information to the Department at:

Alaska Department of Environmental Conservation
Air Permits Program
610 University Avenue
Fairbanks, Alaska 99709

Stationary Source Name: _____

Permit Number: _____

Date: _____

A Semiannual Facility Operating Report from
(Fill in the correct operating period)

10/1/___ - 3/31/___ Due on **April 30**
4/1/___ - 9/30/___ Due on **October 30**

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Signature

Printed Name

Title

Information in the following conditions is required to be reported in the semi-annual operating report required by Condition 70.

Condition 4. Asphalt Plant Visible Emissions Reporting

Include in each operating report:

- a. copies of the observation results (i.e. opacity observations) for each emission unit except for the observations the Permittee has already supplied to the Department;
- b. a summary to include:
 - (i) number of days observations were made;
 - (ii) highest six-minute average observed;
- c. a summary of any monitoring or record keeping required under condition 2 that was not done.

Condition 7. Diesel Engine Visible Emissions Reporting.

Include in each operating report:

- c. which visible-emissions plan of condition 5 was used for each emission unit; if more than one plan was used, give the time periods covered by each plan;
- d. for each emission unit under the Method 9 Plan,
 - (i) copies of the observation results (i.e. opacity observations) for each emission unit that used the Method 9 Plan, except for the observations the Permittee has already supplied to the Department; and
 - (ii) a summary to include:
 - (A). number of days observations were made;
 - (B). highest six-minute average observed; and
 - (C). dates when one or more observed six-minute averages were greater than 20 percent;
- e. for each emission unit under the Smoke/No Smoke Plan, the number of days that Smoke/No Smoke observations were made and which days, if any, that smoke was observed; and
- f. a summary of any monitoring or record keeping required under conditions 5 and 5.3c(ii) that was not done.

Condition 8. Particulate Matter (PM) Standard Requirements. Asphalt Plant PM Emissions Standard, Monitoring, Recordkeeping, and Reporting.

Include in the operating report the information required to be reported under this condition.

Condition 11. Diesel Engine PM Recordkeeping.

Within 180 calendar days after letter of authorization is issued for this General Permit, the Permittee shall record the exhaust stack of diameter(s) of each diesel engine authorized under this General Permit. Report the stack diameters in the next operating report.

Condition 12. Diesel Engine PM Reporting

In each operating report include

- a. the dates, diesel engine ID(s), and results when an observed 18-minute average was greater than an applicable threshold in condition 10.2;

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- b. a summary of the results of any PM testing under condition 10; and
- c. copies of any visible emissions observation results (opacity observations) greater than the thresholds of condition 10.2, if they were not already submitted.

Condition 15. Sulfur Compound Emissions for Sources Using Fuel Oil– Reporting.

Include in the operating report:

- a. a list of the fuel grades received at the Stationary Source during the reporting period;
- b. for any grade with a maximum fuel sulfur greater than 0.5 weight percent, the fuel sulfur of each shipment; and
- c. for fuel with a sulfur content greater than 0.75 percent, the calculated SO₂ emissions in ppm.

Condition 16. Sulfur Compound Emissions for sources using fuel gas.

Include copies of the records of the semiannual statement from the fuel supplier or the sulfur content analysis (required by Condition 16.2) with the operating report, for the period covered by the report.

Condition 17. Sulfur Compound Emissions – North Slope – Monitoring, Record Keeping, and Reporting.

For liquid fuel from a North Slope topping plant, the Permittee shall obtain from the topping plant the results of a monthly fuel analysis. Include in the operating report a list of the sulfur content measured for each month covered by the report.

Condition 18. Used Oil Fuels.

Include with the operating:

- a. results of each used oil analysis as set out by condition 18.1a; and
- b. for each batch of used oil fuel blended, the amounts of fuel oil and used oil; the blend ratio; the final sulfur content; and the blend date.

Condition 21. Ambient Air Quality Protection: Additional Restrictions for Bells Flats (Kodiak).

In any equipment operating at an Asphalt Plant in the Bells Flats area of Kodiak that burns liquid fuel, submit records of fuel burned and hours of operation in the operating report.

Condition 27. NSPS Subpart IIII - Diesel Engines.

If the Permittee uses a diesel particulate filter to comply with the emission standards in 40 C.F.R. 60.4204 report in the operating report either a or b.

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- a. the daily particulate filter backpressure and any actions taken when the backpressure reaches the limit, or
- b. whether the particulate filter backpressure monitor indicated the backpressure limit was approached, and actions taken to reduce the backpressure on the particulate filter.

Condition 28. Pre-2007 model year stationary CI ICE

If applicable, report in the operating report the method of demonstrating compliance with this condition.

Condition 30. CI ICE located in areas not accessible by the Federal Air Highway System.

Report in the operating report the fuel sulfur content of the fuel combusted in stationary CI ICE. Include copies of fuel receipts or fuel analyses.

Condition 36. Rock Crusher Visible Emissions Monitoring Recordkeeping and Monitoring.

For each month of the reporting period, the Permittee shall include in the Operating Report copies of the visible emissions monitoring records performed under Condition 36.

Condition 40-41. Visual Emissions Observations for Subpart OOO Equipment

Report results of Method 9 readings and copies of inspection records.

Condition 43. Pollution Control Equipment Breakdown Reporting

In the operating report provide a summary of any pollution control equipment breakdowns. The summary shall include:

- d. the equipment involved;
- e. the date of the breakdown; and
- f. the date the equipment was returned to service.

Condition 45. Alaska Coastal Management Program Compliance

List in chronological order the location where the Stationary Source operated during the reporting period.

Certify the compliance status with applicable coastal district policies in the operating report when operating within the boundaries of a coastal district.

Condition 49. Good Air Pollution Control Practice

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Submit records required under this condition.

Condition 53. Monitoring, Record Keeping, and Reporting for Air Pollution Prohibited

With each operating report, include a brief summary report which must include

- a. the number of complaints received;
- b. the number of times the Permittee or the Department found corrective action necessary;
- c. the number of times action was taken on a complaint within 24 hours;
and
- d. the status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.

Condition 70. Operating Reports.

Submit Operating Report in accordance with this condition.

Attachment 4: Annual Compliance Report

Permittee: _____ Stationary Source Name: _____

Permit Number: _____ Period of Certification: _____

STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
Condition 1 Industrial Process and Fuel Burning Equipment Visible Emissions	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (did not operate)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> opacity reading records <input type="checkbox"/> no opacity readings in excess of standard <input type="checkbox"/> Other (attach description & documentation)
Condition 2 Asphalt Plant Visible Emissions Monitoring	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> opacity reading records <input type="checkbox"/> no opacity readings in excess of standard <input type="checkbox"/> Other (attach description & documentation)
Condition 3 Asphalt Plant Visible Emissions Recordkeeping	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> VE records kept <input type="checkbox"/> Other (attach description & documentation)
Condition 4 Asphalt Plant Visible Emissions Reporting	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> VE records reported <input type="checkbox"/> Other (attach description & documentation)
Condition 5 Diesel Engine Visible Emissions Monitoring	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (did not operate)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> opacity reading records <input type="checkbox"/> no opacity readings in excess of standard <input type="checkbox"/> Other (attach description & documentation)
Condition 5.1 Method 9 Plan	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (Using smoke/no smoke plan)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> opacity reading records <input type="checkbox"/> no opacity readings in excess of standard <input type="checkbox"/> Other (attach description & documentation)
Condition 5.2 Smoke/No Smoke Plan	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance	<input type="checkbox"/> Continuous	<input type="checkbox"/> smoke readings kept <input type="checkbox"/> smoke/no smoke noted <input type="checkbox"/> Other (attach description & documentation)

STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
	<input type="checkbox"/> Not applicable (did not operate)	<input type="checkbox"/> Intermittent	documentation)
Condition 5.3 Corrective actions based on smoke/no smoke plan	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (did not operate)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> smoke records kept <input type="checkbox"/> corrective action resulted in no smoke <input type="checkbox"/> Other (attach description & documentation)
Condition 6 Diesel Engine Visible Emission Recordkeeping	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> VE records kept <input type="checkbox"/> Other (attach description & documentation)
Condition 7 Diesel Engine Visible Emission Reporting	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> VE records submitted <input type="checkbox"/> Other (attach description & documentation)
Condition 8 Asphalt Plant PM Emission Standard and MR&R	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Source test results submitted <input type="checkbox"/> Source test requirement met, no testing required <input type="checkbox"/> Other (attach description & documentation)
Condition 9 Diesel Engine PM Standard	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> EPA Method 5 source test <input type="checkbox"/> Opacity limit not exceeded <input type="checkbox"/> Other (attach description & documentation)
Condition 10 Diesel Engine PM Monitoring	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> EPA Method 5 source test accomplished <input type="checkbox"/> VE Monitoring <input type="checkbox"/> Other (attach description & documentation)
Condition 11 Diesel Engine PM Recordkeeping	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Stack diameter reported in operating report <input type="checkbox"/> Other (attach description & documentation)
Condition 12	<input type="checkbox"/> In Compliance		<input type="checkbox"/> EPA Method 5 source test

STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
Diesel Engine PM Reporting	<input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	records submitted <input type="checkbox"/> VE Monitoring records submitted <input type="checkbox"/> Other (attach description & documentation)
Condition 13 Sulfur Compound Emissions Standard Requirements	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Fuel delivery records <input type="checkbox"/> Fuel analysis <input type="checkbox"/> Other (attach description & documentation)
Condition 14 Sulfur Compound Emissions Monitoring and Recordkeeping	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Fuel delivery records kept <input type="checkbox"/> Fuel content test results obtained <input type="checkbox"/> SO ₂ emissions calculated <input type="checkbox"/> Other (attach description & documentation)
Condition 15 Sulfur Compound Emissions Reporting	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> SO ₂ excess emissions reported (if any occurred) <input type="checkbox"/> fuel grades reported <input type="checkbox"/> fuel content of shipments reported (if sulfur content >0.5%) <input type="checkbox"/> SO ₂ emissions reported (if sulfur content > 75%) <input type="checkbox"/> Other (attach description & documentation)
Condition 16 Sulfur Monitoring for Emission Units Using Fuel Gas	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Fuel delivery records kept <input type="checkbox"/> Fuel sulfur content did not exceed limit <input type="checkbox"/> Reported as required <input type="checkbox"/> Other (attach description & documentation)
Condition 17 Sulfur Compound Emissions – North Slope Topping Plant	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Fuel delivery records kept <input type="checkbox"/> Fuel sulfur content did not exceed limit <input type="checkbox"/> Reported as required <input type="checkbox"/> Other (attach description & documentation)
Condition 18 Used Oil in Diesel Engines	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance	<input type="checkbox"/> Continuous	<input type="checkbox"/> Fuel blending records kept <input type="checkbox"/> Fuel sulfur content did not exceed limit

STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
	<input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Intermittent	<input type="checkbox"/> Reported as required <input type="checkbox"/> Other (attach description & documentation)
Condition 19 General Requirements	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Records kept of distance between asphalt (and crushers) and the nearest inhabited structure. <input type="checkbox"/> Other (attach description & documentation)
Condition 20 SO2 Special Protection Area	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (did not operate in these areas)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Fuel receipts kept showing that diesel used had sulfur content less than 0.075 wt% sulfur. <input type="checkbox"/> Other (attach description & documentation)
Condition 21 Additional Restrictions for Bells Flats	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (did not operate in Bells Flats)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> If operated within area, kept fuel receipts and/or analysis and operating times logs <input type="checkbox"/> Reported as required <input type="checkbox"/> Other (attach description & documentation)
Condition 22 Open Burning	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (no open burning occurred)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Complied with all terms and conditions <input type="checkbox"/> Other (attach description & documentation) <input type="checkbox"/> Reports kept as required
Condition 23 PM Standards for Asphalt Plants subject to NSPS I	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Records of latest source tests kept on file. <input type="checkbox"/> Other (attach description & documentation)
Condition 24 Performance Test for New Asphalt Plants	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Source test conducted within 60 days of achieving maximum production rate <input type="checkbox"/> Source test conducted within 180 days of initial startup <input type="checkbox"/> Source test requirement

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STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
			previously met <input type="checkbox"/> Unit not subject to NSPS <input type="checkbox"/> Other (attach description & documentation)
Condition 25 Diesel Engines CI ICE Engines constructed after April 1, 2006 or modified or reconstructed after July 11, 2005.	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have CI ICE of this age)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Attach description & documentation)
Condition 26 Operation and maintenance of CI ICE	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have CI ICE of this age)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Attach description & documentation)
Condition 27 Particulate Filter for CI ICE	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have CI ICE of this age)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Attach description & documentation)
Condition 28 Pre-2007 Model CI ICE Demonstration of Compliance	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have CI ICE)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Attach description & documentation)
Condition 29 2007 Model and Later CI ICE Demonstration of Compliance	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have CI ICE)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Attach description & documentation)
Condition 30 CI ICE Fuel Standards	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Attach description & documentation)

STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
	(do not have CI ICE)		
Condition 31 Deadline for Installing Previous Model Year CI ICE	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have CI ICE)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Attach description & documentation)
Condition 32 Source Test for CI ICE	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have CI ICE)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Attach description & documentation)
Condition 33 CI ICE Reporting Requirements	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have CI ICE)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Attach description & documentation)
Condition 34 ADEC copied on Submittals to US EPA	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have CI ICE)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Attach description & documentation)
Condition 35 Rock Crusher Visible Emissions	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have crusher)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Visible emission reading records <input type="checkbox"/> Other (attach description & documentation)
Condition 36 Rock Crusher Visible Emissions MR&R	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have crusher)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Visible emission reading records <input type="checkbox"/> Other (attach description & documentation)
Condition 37 General Requirements: Crushers	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (do not have crusher)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Records showing location relative to nearest residence or occupied structure is less than permit thresholds. <input type="checkbox"/> Other (attach description & documentation)
Condition 38 Rock Crusher Public Access Control Plan	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Public Access Control Plan is up-to-date and available for inspection. <input type="checkbox"/> Other (attach description &

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Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
	(do not have crusher)		documentation)
Condition 39 NSPS OOO Standards for Particulate Matter	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Source Test performed showing compliance w/ PM standards. <input type="checkbox"/> Other (attach documents)
Condition 40 Monitoring for Standards for Particulate Matter	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Monitoring records kept as required <input type="checkbox"/> Other (attach description & documentation)
Condition 41 Reporting and Recordkeeping for Standards for Particulate Matter	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Required records kept <input type="checkbox"/> Reporting requirements met <input type="checkbox"/> Other (attach description & documentation)
Condition 42 Pollution Control Equipment Maintenance Plan	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> All plan records kept <input type="checkbox"/> plan submitted <input type="checkbox"/> plan complied with <input type="checkbox"/> Other (attach description & documentation)
Condition 43.2 Pollution Control Equipment Breakdown	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Department notified of equipment breakdown <input type="checkbox"/> summary of breakdowns included in operating report <input type="checkbox"/> No breakdowns occurred <input type="checkbox"/> Other (attach description & documentation)
Condition 44 Relocation and Reporting of Site Selection	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (did not relocate or attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Relocation application addenda filed 10 days in advance <input type="checkbox"/> Relocation notification submitted but late <input type="checkbox"/> Other (attach description & documentation)
Condition 45 Alaska Coastal Management Program	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Reported as required <input type="checkbox"/> Other (attach description & documentation)

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STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
	(not operating in an Alaska Coastal District)		
Condition 46 Administration fees.	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Permit administration fees paid <input type="checkbox"/> Other (attach description & documentation)
Condition 47 Assessable emissions	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Assessable emissions calculations kept on file. <input type="checkbox"/> Other (attach description & documentation)
Condition 48 Assessable Emission Estimates	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Assessable Emission Estimates submitted <input type="checkbox"/> Other (attach description & documentation)
Condition 49 Good Air Pollution Control Practices	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Regular maintenance performance and records kept <input type="checkbox"/> Other required records kept <input type="checkbox"/> Other (attach description & documentation)
Condition 49.2g Baghouse inspection requirements	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (uses scrubber)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Inspections performed and records kept <input type="checkbox"/> damaged parts replaced <input type="checkbox"/> operating parameters monitored and recorded <input type="checkbox"/> Other (attach description & documentation)
Condition 49.3 Scrubber inspection requirements	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (uses baghouse)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Inspections performed and records kept <input type="checkbox"/> damaged parts replaced <input type="checkbox"/> operating parameters monitored and recorded

STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
			<input type="checkbox"/> Other (attach description & documentation)
Condition 50 Dilution	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Inspection records <input type="checkbox"/> Other (attach description & documentation)
Condition 51 Reasonable Precautions to Prevent Fugitive Dust	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> All reasonable precautions taken <input type="checkbox"/> Fugitive dust plan complied with <input type="checkbox"/> Other (attach description & documentation)
Condition 52 Stack Injection	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> No other materials were released or directed into the exhaust other than process materials <input type="checkbox"/> Other (attach description & documentation)
Condition 53 Air Pollution Prohibited	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Record kept of complaints <input type="checkbox"/> Complaints investigated and corrective action taken as necessary <input type="checkbox"/> Other (attach description & documentation)
Condition 54 Asbestos NESHAP	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> All reports submitted as required <input type="checkbox"/> No reports required <input type="checkbox"/> Other (attach description & documentation)
Condition 55 Refrigerant Recycling and Disposal	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Records of disposal show compliance with this condition <input type="checkbox"/> No refrigerants were used or were disposed of <input type="checkbox"/> Other (attach description & documentation)
Condition 56 Requested source tests	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance	<input type="checkbox"/> Continuous	<input type="checkbox"/> Source test records <input type="checkbox"/> No source tests were requested

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STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
	<input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Intermittent	<input type="checkbox"/> Other (attach description & documentation)
Condition 57 Operating Conditions	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Source tests records <input type="checkbox"/> No source tests were conducted <input type="checkbox"/> Other (attach description & documentation)
Condition 58 Reference Test Methods	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Source tests records <input type="checkbox"/> No source tests were conducted <input type="checkbox"/> Other (attach description & documentation)
Condition 59 Excess Air Requirement	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Source tests records <input type="checkbox"/> No source tests were conducted <input type="checkbox"/> Other (attach description & documentation)
Condition 60 Test Exemption	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	N/A
Condition 61 Test Deadline Extension	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Records kept for source tests extension granted <input type="checkbox"/> No source tests were conducted or did not require an extension <input type="checkbox"/> Other (attach description & documentation)
Condition 62 Test Plans	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> source test plan submittal records <input type="checkbox"/> No source tests were conducted <input type="checkbox"/> Other (attach description & documentation)
Condition 63	<input type="checkbox"/> In Compliance		<input type="checkbox"/> source test notification

STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
Test Notification	<input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	records <input type="checkbox"/> No source tests were conducted <input type="checkbox"/> Other (attach description & documentation)
Condition 64 Test Reports	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> source test report submittal records <input type="checkbox"/> No source tests were conducted during this annual certification period <input type="checkbox"/> Other (attach description & documentation)
Condition 65 Recordkeeping Requirements	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Records kept as required <input type="checkbox"/> Other (attach description & documentation)
Condition 66 Information Requests	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Copies of information submitted kept on file. <input type="checkbox"/> No information requests were made <input type="checkbox"/> Other (attach description & documentation)
Condition 67 Submittals	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> All reports submitted to the correct address and in the proper format <input type="checkbox"/> Other (attach description & documentation)
Condition 68 Certification	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> All reports/records certified by responsible official <input type="checkbox"/> Other (attach description & documentation)
Condition 69 Excess Emission and Permit Deviations	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> All excess emissions reported were signed by responsible official <input type="checkbox"/> All permit deviations reported

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STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
			<input type="checkbox"/> No excess emissions or permit deviations occurred <input type="checkbox"/> Other (attach description & documentation)
Condition 70 Operating Reports	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Operating reports submitted and signed by responsible official <input type="checkbox"/> Operating reports submitted on time <input type="checkbox"/> Other (attach description & documentation)
Condition 71 Annual Compliance Certification	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Annual compliance certification submitted and signed by responsible official <input type="checkbox"/> Annual compliance certification submitted on time <input type="checkbox"/> Other (attach description & documentation)
Condition 72 NSPS and NESHAP Reports	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> NSPS reports submitted <input type="checkbox"/> NESHAP reports submitted <input type="checkbox"/> No NSPS or NESHAP reports were required <input type="checkbox"/> Other (attach description & documentation)
Condition 73 Non-road engines	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> reports submitted upon Department's request
Condition 74 Compliance with permit terms	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Complied with all terms and conditions <input type="checkbox"/> Other (attach description & documentation)
Condition 75 Compliance with each permit term and condition	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Complied with all terms and conditions <input type="checkbox"/> Other (attach description & documentation)

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STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
	(attach explanation)		
Condition 76 Not a defense	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Did not operate in violations of the limits of the permit <input type="checkbox"/> Other (attach description & documentation)
Condition 77 Each permit term and condition is independent	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Complied with all terms and conditions <input type="checkbox"/> Other (attach description & documentation)
Condition 78 The permit may be modified	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Permit not modified <input type="checkbox"/> Other (attach description & documentation)
Condition 79 No property rights	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Did not assume any property rights with regards to the permit <input type="checkbox"/> Other (attach description & documentation)
Condition 80 Inspector access provided on request	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (attach explanation)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Granted access <input type="checkbox"/> No inspector requested access <input type="checkbox"/> Other (attach description & documentation)
Condition 81 Permit Renewal	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (permit not due for renewal)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Permit Renewal Application submitted <input type="checkbox"/> Permit renewal not due <input type="checkbox"/> Other (attach description & documentation)
Condition 82 Permit Applications	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance <input type="checkbox"/> Not applicable (permit not due for renewal)	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Permit Renewal Application submitted <input type="checkbox"/> Permit Application not submitted <input type="checkbox"/> Other (attach description & documentation)
Condition 83 US EPA copied on permit renewal	<input type="checkbox"/> In Compliance <input type="checkbox"/> Not In Compliance	<input type="checkbox"/> Continuous	<input type="checkbox"/> Permit Renewal Application submitted <input type="checkbox"/> Permit not due renewal

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STANDARD PERMIT CONDITIONS			
Condition Number and Description	Compliance Status	Continuous/ Intermittent	Method to determine compliance
application		<input type="checkbox"/> Intermittent	<input type="checkbox"/> Other (attach description & documentation)

Certification:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: _____ Title: _____ Date: _____

Signature: _____ Phone Number: _____