

Asphalt Plant Compliance Plan

Permit: 12XY3456
Issued to: Asphalt Co, Inc.
AIRS ID: 123/4567/8980

1) 'Daily Starting Procedure' will include the following steps:

- a) Visually inspect all equipment daily
- b) Zero out controls and weigh belts
- c) Circulate hot oil pump
- d) Set burner limits (high and low)
- e) Set exhaust limits (high and low)
- f) Start:
 - i) Exhaust Fan
 - ii) Burner blower
 - iii) Bucket Elevator/Slat conveyor
 - iv) Mixer drum
 - v) Conveyor and feeder belts
 - vi) Aggregate Flow
- g) Start burner, increase temperature to specified mix temperature and maintain temperature
- h) Start liquid asphalt cement (A/C) Pump

→ This section is not relevant to an O&M plan and should be removed.

2) Normal Operations

- a) Normal operations will include maintaining proper mix temperatures at the highest tons per hour average for the day's production to meet demand without exceeding the plant capacity.

→ This section is not relevant to an O&M plan and should be removed.

- b) Normal range of differential pressure across baghouse, as measured by manometer is ~~2–7 inches~~. _____ (specify pressure range and units).

→ Pressure drop across the baghouse is specific to each unit. The O&M plan should include space for operators to include their specific information, and doing so should be listed in the instructions.

- c) Permitted production limits: ~~500 tons/hr and 1,000,000 tons/12-month period~~.

→ Same comment as above.

3) Daily Plant Shutdown

- a) Reverse the procedure listed in Item 1.

→ This section is not relevant to an O&M plan and should be removed.

4) Recommended Maintenance

- a) Daily and yearly maintenance diaries are maintained to record replacement of parts and repairs. Recommended maintenance will include:
- i) Calibration of weigh belts as needed.
→ This section is not relevant to an O&M plan and should be removed; it is not required by us.
 - ii) Inspection of burner and adjustments made per manufacturer's specifications or more frequently if needed.
(1) Burner will be checked after any switch in fuels or at least twice annually using an exhaust gas analyzer. The burner will be adjusted (i.e. tuned) if needed, annually at a minimum.
→ This is NOT required unless by a specific permit condition. If it is in the O&M plan, however, it becomes required. Please remove it, or list it at the end as a condition for operators to include if they need to. The instructions should explain this.
 - iii) Drum inspection and parts replaced per manufacturer's specifications or more frequently if needed.
 - iv) A/C pump inspected and cleaned or parts replaced per manufacturer's specifications or more frequently if needed.
→ For all maintenance to be performed 'per manufacturer's specifications', please state that copies of the manufacturer's information is 1) included as a copy with the submitted plan; and 2) to be kept at the site with a copy of this plan.

This section should specify that records of all maintenance activities will be kept. Please develop and include a log of:

Maintenance actions performed

Periodic maintenance / checks completed

Maintenance checks can be on the daily log form or on a separate form(s). Copies MUST be included with the plan.

5) Pollution Control Equipment

- a) Baghouse stack emissions will be inspected daily and parts replaced as scheduled per manufacturer's specifications or more frequently if needed.
- b) Baghouse socks will require periodic inspection by black-lighting (also known as a dye test) annually at a minimum.
- c) Baghouse auger system will be visually observed daily for overloading and excess fugitive emission emissions that would indicate obstructions or malfunctions of the system.
- d) Thermocouples and mix temperatures will be monitored continually for abnormal readings during the operating shift by using thermometers to compare temperatures.
→ This section is not relevant to an O&M plan and should be removed.

e) Weigh belts will be checked periodically by collecting material in a truck and comparing weight on certified scales. If weights are different, calibration will be performed. Material must weigh the same from off the belt and on the scale.

→ This section is not relevant to an O&M plan and should be removed

Please also include a log form for operators to record daily:

Start time for operations

Stop time for operations

Production total

Check for visible emissions completed *

Any visible emissions noted

If Visible Emissions noted, what action(s) were taken

*Note that ALL emission points need to be checked, not just the baghouse stack

6) Corrective Measures for Equipment Malfunction

a) Operating system malfunctions will be handled accordingly:

- i) Observe exhaust stack and check for pipe restrictions.
- ii) Check unit doors for proper seal.
- iii) Check total unit for leads and proper seal.
- iv) Check baghouse socks and ensure that they are properly secured.
- v) Observe plant for normal operation.

- If the above checks do not return operations to normal, equipment will be shut down and plant operations halted. A further investigation will be made to determine the cause of the malfunction. When the cause of the malfunction has been identified, the necessary adjustments and repairs will be made before operations continue.

b) Manometer indicating improper reading:

Check collector for proper seal.

Check doors for proper seal.

Check fan for proper rotation and speed.

Check gauge for proper seal and installation.

Check baghouse socks for proper seal and look for damaged or broken baghouse socks.

- If the above checks do not return operations to normal, equipment will be shut down and plant operations halted. A further investigation will be made to determine the cause of the malfunction. When the cause of the malfunction has been identified, the necessary adjustments and repairs will be made before operations continue.

c) Excessive Emissions from the Baghouse Exhaust Stack

Check air pollution equipment for proper operation.

Check baghouse socks for proper seal and look for damaged or broken baghouse socks.

- If the above checks do not return operations to normal, equipment will be shut down and plant operations halted. A further investigation will be made to determine the cause of the malfunction. When the cause of the malfunction has been identified, the necessary adjustments and repairs will be made before operations continue

→ What we're looking for under 'corrective measures' is a statement that if any excess emissions are observed, that the plant will be corrected immediately, or shut down until the problem can be addressed. Operators should also log when a problem was noted, what action was taken, and when it was resolved.

7) Emission Calculations

- For a final approval permit that requires monthly rolling total emissions, calculations will be performed on the end of the month based on the previous month's production. Calculations will be performed and maintained either at the plant using a spreadsheet provided by the Environmental Department or at the corporate office.

→ As previously discussed, please develop a spreadsheet to calculate production and emissions on a 12 month rolling total basis. The instructions should explain which emission factors or formulas need to be updated with plant-specific data. I suggest building the spreadsheet with default emission factors that are very high, so operators will notice if they have not been updated. SBAP may have an excel spreadsheet you can use.

→ Please include space for operators to specify where the records will be kept. If not at the plant site, include space to specify who (name and phone number) to contact for records.

8) Personnel Training

- One person familiar with the asphalt plant operation will be trained every six months to read opacity per the US EPA Method 9 – Visible Determination of the Opacity of Emissions from Stationary Sources.

→ This is not required by us.

→ If the facility will commit to this, they will also be required to take a Method 9 reading each time excess visible emissions are suspected.

- All operating personnel are responsible for the operation of pollution control equipment and will be briefed on this compliance plan by the plant manager. Precautionary abatement measures will be reviewed and updated as conditions or procedures change.

9) Emission Event Reporting Procedure

- The facility will be operated in a manner to maintain compliance and will not exhibit emissions in excess of 20% opacity. Any unpredictable failure or air pollution control equipment or processing equipment that results in a violation of emission control regulations or the conditions of permit 2XY3456 will be reported no later than 10 am the following day to:

1) Colorado Department of Health and Public Environment
Air Pollution Control Division

303-692-3150