

SOUTHWEST REGIONAL OFFICE

MEMO

TO Air Quality Permit File SOOP # 65-00602
Derry Construction Co., Inc. / Torrance Plant

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DATE April 18, 2013

RE Review of State Only Operating Permit Renewal Application
Derry Township, Westmoreland County
APS# 744148; AUTH # 870975; PF# 511645

Background

On February 15, 2011, the Department received a State Only Operating Permit renewal application for Derry Construction Co., Inc. / Torrance Asphalt Plant located in Derry Township, Westmoreland County. The Department determined the renewal application was administratively complete on April 1, 2011. The last authorized operating permit was issued on August 21, 2006 and expired August 21, 2011. The Torrance Plant has been operating under 25 Pa Code Section 127.446(c): The terms and conditions of an expired permit are automatically continued pending the issuance of a new permit when the permittee has submitted a timely and complete application and paid the fees required by Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

Sources, Control Devices and Emissions

The Torrance Plant consists of a 150 ton per hour Barber-Greene batch asphalt plant that was installed in the early 1980s. The process involves drying aggregate material in the form of sand, gravel, crushed stone, or a combination of materials in a large rotary drum dryer. The dryer is equipped with a Hauck Manufacturing Co. Model SJ-4360 burner unit, rated heat input of 75 MMBtu/hour when fired with natural gas or No. 2 fuel oil. The dryer exhaust is controlled by a knockout box and fabric filter, Gentec Model No. 495-14EI, with a flow of 52,000 acfm at 300 degrees Fahrenheit. The removal efficiency for particulate is rated at 99.3 percent.

The facility wide potential emissions below are based on an annual production limit of 495,000 tons per year of asphalt. Derry Construction leases a small portion of land on a larger quarry owned by Hanson. All raw material crushing, stockpiling and material

handling is conducted by Hanson quarry. Trucks that are loaded with hot mix asphalt travel roughly 50 feet before leaving the Torrance Plant leased property and travel on roadways owned and maintained by the quarry. Therefore, potential emissions generated from the Torrance Plant are based on AP-42 Emission Factors, Chapter 11: 99 tpy CO; 25.89 tpy NO_x; 22.92 tpy SO_x; 2.03 tpy VOC; 3.9 tpy PM; 2.43 tpy PM₁₀ and 1.86 tpy HAPs.

Testing

The Torrance Plant is required to perform annual dryer burner tune-ups using a portable CO analyzer from previous operating permit conditions. An additional condition has been added to be consistent with the terms of GP-13 that requires stack testing for particulate (Method 5 and Method 9), NO_x, CO and VOC every five years. Since testing has not been recently conducted, the initial test will be required through an operating condition to be conducted within 18 months of issuance.

Compliance

The Torrance Plant is required to conduct a daily survey of the facility during daylight hours while the facility is operating to ensure compliance with the visible stack emission, fugitive emission and malodor restrictions in 25 Pa. Code §§ 123.1, 123.2, and 123.31. Records of the daily survey performed must be recorded. Monthly preventative maintenance inspections are to be performed on the control devices and recorded in an on-site log. The facility is also required to minimize drop height from loaders to bins, maintain compact stockpiles, maintain a set vehicle pattern, post speed limit sign of 15 mph as well as promptly remove earth or other material from paved roads onto which earth or other material has been transported by trucking or earth moving equipment, or other means. Particulate matter emissions are not to exceed 0.02 gr/dscf and visible emissions are not to exceed 20 percent opacity from the baghouse exhaust stack at any time. The facility is not permitted to exceed the production of 495,000 tons per year of asphalt. Annual burner tuning must be performed each season within four weeks of startup. The facility must also conduct a stack test every five years for particulate. Records of daily asphalt production, as well as preventative maintenance inspections and 12-month rolling totals of each fuel type and quantity used are required to be kept on site for five years.

On February 15, 2011, as required, an Air Pollution Control Act Compliance Review Form was submitted with the renewal application. The facility is required to document all violations or enforcement actions identified by the Department of an operating permit or plan approval. Derry Construction has not had a violation or enforcement action taken by the Department in the last five years.

Regulatory Analysis

Derry Construction is subject to 40 CFR Part 60 Subpart I- Standards of Performance for Hot Mix Asphalt Facilities per 60.90(b) as a facility that commenced construction or modification after June 11, 1973. The facility is subject to Subpart I; however, the facility

Conclusions and Recommendations

On February 15, 2011, Derry Construction Co., Inc. / Torrance Asphalt Plant applied for a State Only Operating Permit renewal for their facility located in Derry Township, Westmoreland County. Derry Construction has complied with the municipal notification requirements contained in 25 Pa. Code §127.413 and the application fee requirements contained in 25 Pa. Code §127.704 (b)(3). The draft Operating Permit will be submitted to Derry Construction for review. The Notice of Intent to Issue will be published in the PA Bulletin for a 30-day public comment period.

On May 10, 2010, a compliance inspection was performed by Mr. David Yargar, Air Quality Specialist. Mr. Yargar did not note any violations at the time of his inspection. It is my recommendation that the State Only Operating Permit for Derry Construction Co., Inc. / Torrance Asphalt Plant, SOOP 65-00602, be issued.