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Olympia, WA 98502

*Representing Clallam, Grays Harbor, Jefferson,
Mason, Pacific, and Thurston Counties*

1-800-422-5623 • (360) 539-7610

April 26, 2024

Lakeside Industries
PO Box 7016
Issaquah, WA 98027

RE: Final Determination – 24NOC1632

Greetings:

Olympia Region Clean Air Agency (ORCAA) has approved your Notice of Construction for the facility located at **11125 Durgin Road SE, Olympia, Thurston County, Washington**.

Read, become familiar with, and retain these documents for future reference. The applicable regulations and special conditions of approval identified in your permit are enforceable by ORCAA.

You may appeal the Approval Order within 30 days, by sending a written appeal to the Pollution Control Hearings Board and ORCAA.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer DeMay". The signature is fluid and cursive, with a large, stylized initial "J".

Jennifer DeMay, PE
Engineering Supervisor

Enclosures

ORDER OF APPROVAL
NOTICE OF CONSTRUCTION 24NOC1632
ISSUED to Lakeside Industries on
APR 24 2024

This Order of Approval ("Order") is issued in accordance with Olympic Region Clean Air Agency ("ORCAA") Rule 6.1.11.

Conditional approval to process recycled asphalt pavement located at 11125 Durgin Road SE in Olympia ("Approved Location"), for operation solely as described in the associated Notice of Construction ("NOC") application NOC# 24NOC1632, is hereby GRANTED to Lakeside Industries ("Applicant"), subject to the Conditions of Approval listed below.

This Order and the Conditions of Approval herein remain in effect for the life of the Approved Equipment as used at the Approved Location and shall be binding on Applicant, current owners and operators of the equipment, and Applicant's heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down. The Applicant must notify any subsequent owner, operator, heirs, successor or assigns of this Order and the Conditions of Approval herein.

Conditions of Approval established in this Order shall be enforceable in addition to any applicable state, local and federal regulations or standards in existence now or in the future. Compliance with the conditions of this Order do not relieve the Applicant or any owner or operator from compliance with ORCAA Regulations, chapter 70A.15 of the Revised Code of Washington, or any other emissions control requirements, nor from any penalties for failure to comply with the same. Applicant may appeal this Order to the Pollution Control Hearings Board ("PCHB") by filing a written appeal with the PCHB and serving a copy upon ORCAA within thirty (30) days of receipt of this Order.

This Order supersedes Order NOC# 08MOD642 and is GRANTED, for the Approved Location, subject to the following Conditions of Approval:

- 1. Fugitive Emission Control Requirements:** Reasonable and appropriate precautions must be taken as necessary to prevent fugitive emissions from becoming a nuisance or violating an emission standard or requirement. Reasonable precautions include, but are not limited to, the following:
 - a) Taking appropriate measures to prevent the track out of dirt and debris onto public rights-of-way and roads.
 - b) Paving the access road from the County road to the asphalt plant within 30-days from commencing operation of the plant.
 - c) Cleaning the paved access road of dust and debris when necessary to prevent fugitive dust from vehicle traffic.

- d) Applying water spray or another ORCAA-approved dust suppressant to unpaved areas, when necessary, to prevent fugitive dust from vehicle traffic associated with operation of the asphalt plant.
- e) Adopting and enforcing a plant site speed limit of five (5) miles per hour for unpaved roads within the site.
- f) Maintaining enclosures and covers on the hot mix elevator and storage silos.
- g) Maintaining the dryer, elevator and storage silos under a negative pressure when operating.
- h) Covering asphalt loads during transport.
- i) Installing, maintaining and operating a control system capable of capturing and controlling fugitive emissions from asphalt truck load out operations.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1); ORCAA Rule 8.3(c) and 8.5; WAC 173-400-040]

- 2. Compliance with Nuisance-Air Prohibitions:** Lakeside shall minimize emissions to levels that assure compliance with applicable nuisance-air prohibitions including, but not limited to, nuisance-odor prohibitions in ORCAA Rule 8.5(c), and fallout prohibitions in ORCAA Rule 8.3(e). Lakeside shall devise a plan to implement additional emissions control measures if more than one notice of violation (NOV) of the same nuisance regulation is issued to Lakeside in any month. The plan shall describe proposed control measures and shall include a schedule for their implementation. Upon ORCAA's approval, the plan shall be implemented according to the schedule approved by ORCAA.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1); ORCAA Rule 8.5(c) and 8.3(e)]

- 3. Operational Requirements and Limits:** The following operational requirements apply:

- a) Aggregate shall not contain any petroleum-contaminated soils.
- b) The asphalt production rate in terms of pounds or tons of asphalt produced per hour shall not exceed the hourly rates the plant operated during the most recent compliance source test unless prior approval is given by ORCAA.
- c) The asphalt production rate of the drum dryer shall not exceed 300 tons per hour (daily average).
- d) Lakeside shall install and maintain a differential pressure gage across the baghouse filters.
- e) The dryer shall not be operated unless the baghouse is on-line, and fully operational. The term "fully operational" shall mean that the baghouse has been maintained and is operating in accordance with requirements contained in the O&M plan described below.
- f) Idling or parking of asphalt trucks, whether empty or loaded along Durgin Road, old Pacific Highway or within a 300-foot radius around the entrance to the gravel mine shall be prohibited.
- g) Annual production of hot mix asphalt product shall not exceed 300,000 tons in any twelve (12) consecutive month period.
- h) Only ORCAA-approved release-agents that do not emit volatile organic compounds at ambient temperatures, such as vegetable oil or surfactants, may be used.
- i) The asphalt plant, silos and other ancillary equipment shall be consistent with specifications of the asphalt plant as approved by Thurston County.

[Regulatory Basis: ORCAA Rule 6.1.12; WAC 173-400-091]

4. **Federal New Source Performance Standard for Asphalt Plants:** Lakeside shall comply with the requirements of 40 CFR Part 60, Subpart A and Subpart I.
[Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1); 40 CFR Part 60, §60.90]
5. **Baghouse Stack Opacity:** Emissions from the baghouse exhaust stack shall not exceed five percent (5%) opacity (six-minute average) as determined in accordance with EPA Method 9.
[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2)]
6. **Silo and Elevator Fugitive Leaks:** There shall be no visible fugitive emissions from the elevator or silos in excess of five percent (5%) opacity (any three minutes in a 60-minute period) as determined in accordance with Ecology Method 9A.
[Regulatory Basis: ORCAA Rule 8.8 and WAC 173-400-040(3)]
7. **Particulate Limit:** Filterable particulate emissions from the baghouse exhaust stack shall not exceed 0.02 grains per dry standard cubic foot of exhaust corrected to 15% oxygen (gr/dscf @ 15% O₂). When required, compliance shall be demonstrated in accordance with EPA Method 5 (40 CFR Part 60, Appendix A) and the procedures in §60.93(b)(1).
[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2)]
8. **Dryer Fuel Specifications:** The drum dryer shall combust natural gas or propane and shall not begin operating until natural gas supplies are available to the plant. Diesel may be used up to 500 hours per 12-month period as a back-up fuel only when natural gas supplies are disrupted, provided that the diesel contain no more than 0.05% sulfur by weight. Combustion of waste oil shall be prohibited.
[Regulatory Basis: ORCAA Rule 6.1.4(a)(2) ; WAC 173-400-113(2)]
9. **O&M Plan:** Lakeside shall develop and implement an Operations and Maintenance (O&M) plan for minimizing and controlling fugitive dust and maintaining pollution control equipment. The O&M plan shall be kept in a manual on site and made available to plant operators. At a minimum, the O&M plan shall contain the following:
 - a) Standard procedures, criteria and prescribed frequency for inspecting and cleaning vehicles prior to leaving the site and for cleaning any track-out of dirt and debris.
 - b) Designated person at the plant for responding to and resolving air emissions related complaints.
 - c) Schedule and standard procedures for monitoring and maintaining the dryer including the dryer seals, burner, transfer points and other dryer components critical to air pollution control.
 - d) Schedule and standard procedures for monitoring and maintaining the baghouse including monitoring the baghouse pressure drop, monitoring visual emissions from the baghouse, periodic internal inspection of the baghouse and standard procedures for bag replacement.
 - e) Prescribed acceptable operating range for the baghouse pressure drop.
 - f) A schedule and procedures for conducting baghouse leak checks.
 - g) Criteria and procedures for replacing bags that are worn or damaged.*[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); ORCAA Rule 8.8]*

10. Dryer Burner Maintenance: Lakeside shall annually inspect and service the dryer burner to maintain optimal combustion conditions in the dryer. Optimal combustion conditions shall include criteria that NO_x and CO at the exhaust exit of the dryer are maintained to concentrations less than or equal to 60 and 480 parts per million by volume, dry (ppmvd), respectively, and standardized to 15% O₂.

[Regulatory Basis: ORCAA Rules 6.1.4(a)(2); WAC 173-400-113(2); ORCAA Rule 8.8]

11. Monitoring: The following shall be monitored:

- a) Composition of, and toxic ingredients in fuels, liquid asphalt cement and release agents shall be monitored for conformance with the applicable limits in this Order of Approval at the time of purchase or prior to acceptance by reviewing Material Safety Data Sheets (MSDS) or other documents certifying the material or fuel composition.
- b) The rate of asphalt produced in terms of tons per hour shall be monitored continuously. The monitoring systems shall be inspected and calibrated at least annually. A visible display of the hourly asphalt production rate shall be provided in the control house.
- c) The total cumulative amount of asphalt produced shall be monitored in terms of tons produced per month and consecutive 12-month period.
- d) The total cumulative amount natural gas and propane combusted by both the drum dryer and liquid asphalt heater shall be monitored.
- e) Pressure drop across the baghouse shall be monitored continuously. A visual display of the baghouse pressure drop shall be provided either in the control room or on the baghouse itself at a location readily discernable from ground level.

[Regulatory Basis: ORCAA Rules 6.1.4(a)(2) ; WAC 173-400-113(2); ORCAA Rule 8.8]

12. Recordkeeping: The following records shall be maintained for at least five years from the date of origination and reported to ORCAA upon request:

- a) Complaints received.
- b) Current Material Safety Data Sheets (MSDS) for fuels used, the liquid asphalt cement and release agents used.
- c) The amount in tons of asphalt produced per month.
- d) Sales invoices for asphalt sold.
- e) Record of baghouse pressure drop readings in accordance with the O&M plan.
- f) Fuel certification records for diesel fuel used in the dryer.
- g) The amount of diesel combusted by the drum dryer in gallons.
- h) The amount of natural gas and propane combusted in therms or a similar unit of measure per month.
- i) Dryer maintenance records
- j) Written report from dryer service contractor of findings from dryer inspections including measured combustion indicators such as NO_x and CO concentrations and percent oxygen.
- k) A copy of this Regulatory Order shall be kept on site and made available to plant operators.
- l) Record of the asphalt production rate in terms of tons per hour.

[Regulatory Basis: ORCAA Rule 8.11]

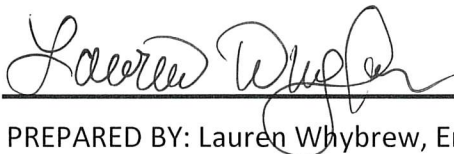
13. Complaints: The phone number of the on-site Lakeside representative responsible for taking and responding to air quality-related complaints shall be posted at the entrance to the mining site on a sign readily readable from passersby on Durgin Road.

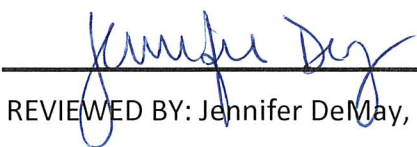
[Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1); ORCAA Rule 8.5(c)]

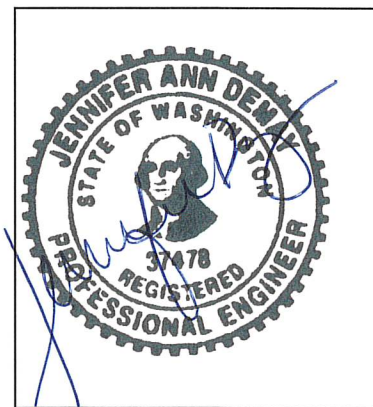
14. Testing: Lakeside shall conduct testing to determine compliance with federal opacity and grain loading standards, compliance with the opacity and grain loading limits of this approval order, and pollutant emission factors in terms of pounds of pollutant per ton of asphalt produced for oxides of nitrogen (NO_x), carbon monoxide (CO), total particulate matter, and volatile organic compounds (VOC) emitted by the drum dryer. Testing shall be conducted within 60 days after achieving the maximum production rate at which the plant will be operated, but not later than 180 days after initial startup of the plant, and at such other times as may be required by ORCAA. Stack testing shall be conducted in accordance with the methods contained in Appendix A of 40 CFR Part 60 and with the requirements in this Regulatory Order. In addition, the following shall be required:

- a) Lakeside shall provide safe sampling ports and platforms that meet the requirements of Method 1 in 40 CFR Part 60, Appendix A.
- b) The total particulate emission factor shall reflect the “back half catch” in accordance with EPA Reference Methods 5 and 202.
- c) A test plan shall be submitted to ORCAA for approval at least 30 days prior to conducting the test.
- d) Written results of all testing shall be submitted to ORCAA within 60 days from completing the test.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1); 40 CFR Part 60, §60.90]


PREPARED BY: Lauren Whybrew, Engineer II Date: 4/24/2024


REVIEWED BY: Jennifer DeMay, PE Date: 4/24/2024





**Olympic Region
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Executive Director
Jeff C. Johnston

*Serving Clallam,
Grays Harbor, Jefferson,
Mason, Pacific, and
Thurston counties.*

NOTICE OF REVISION

FINAL DETERMINATION

to APPROVE:

**Asphalt Recycling at the Existing
Durgin Road Asphalt Plant**

Lakeside Industries

24NOC1632

April 24, 2024

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**NOTICE OF REVISION
FINAL DETERMINATION TO APPROVE**

Olympic Region Clean Air Agency

Issued to:	Lakeside Industries	County:	Thurston (67)
Location:	11125 Durgin Road SE Olympia, WA 98513	Source:	150
Application #:	24NOC1632	RC:	RC2
Prepared on:	April 24, 2024	File:	291

1. Summary

Lakeside Industries (Lakeside) requests Olympic Region Clean Air Agency (ORCAA) to remove the condition prohibiting the use of recycled asphalt pavement (RAP) at the existing Durgin Road asphalt plant, located at 11125 Durgin Road SE in Olympia, Washington. Condition #3(a) of the current NOC for this facility, NOC# 08MOD642, specifically prohibits the plant from adding RAP to the mix. Revisions to air permits are allowed provided the requirements of ORCAA's Rule 6.1.11 are met. ORCAA staff reviewed Lakeside's request and concluded it meets the requirements of ORCAA's Rule 6.1.11 and, therefore, may be approved. Revisions to the conditions of approval are detailed in Section 10 of this Final Determination report.

2. Regulatory Background

ORCAA's Rule 6.1.11 allows changes or revisions to conditions in an Order of Approval (Air Permit), provided the following criteria are met:

1. The change/revision will not cause the source to exceed an emissions standard;
2. No ambient air quality standard or PSD increment will be exceeded as a result of the change;
3. The change will not adversely impact the ability of the Agency to determine compliance with emissions standards;
4. The revised Air Permit continues to require Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER), as applicable and as determined at the time the original Air Permit was approved;
5. The revised Air Permit meets the requirements of Rule 6.1, as applicable; and,
6. The public involvement provisions of Rule 6.1.3 are met.

Lakeside's request to remove the condition prohibiting the use of RAP in the Air Permit will not require installation of any new emissions unit, physical change or change in the method of operation of any emissions units or control technology and will not result in any increase in air emissions. Therefore, the request does not trigger review as a new source, modification, or substantial alteration of air emissions control technology, and is subject only to the requirements for approval under Rule 6.1.11.

3. Facility Background

NOC# 05NOC439: Lakeside received approval from ORCAA in May of 2006 to install and operate a hot mix asphalt (HMA) plant within the existing Holroyd Company Nisqually gravel mine near the Old Pacific Highway on Durgin Road in the Nisqually Valley. Thurston County imposed several restrictions on operation that were incorporated into the Order of Approval for NOC# 05NOC439:

- 1) Although Lakeside had requested ORCAA establish a 700,000 ton annual production limit, the County's approval limited Lakeside to 300,000 tons per 12-consecutive month period. Therefore, Condition 3(g) limited the plant to no more than 300,000 tons of asphalt per year.
- 2) Although Lakeside proposed to ORCAA to use RAP as an aggregate feedstock, the County's approval specifically prohibited the use of RAP because it was not allowed in the Nisqually Valley Planning Area. As a result, Condition #3(a) prohibited Lakeside from using aggregate containing any petroleum contaminated soils or RAP.
- 3) Lakeside proposed to ORCAA to burn low-sulfur diesel fuel initially in the dryer, but intended to switch to natural gas when it became available in the area. However, the County's approval limited the HMA plant to use natural gas or propane as the primary fuel, and to utilize diesel fuel only as a backup fuel. Condition #8 incorporated these restrictions from the County, and specified that the plant must not start production until natural gas became available.

Construction of the plant was completed in December of 2007. The plant began intermittent operation January 17, 2008, and was at full scale operation on April 28, 2008.

NOC# 08MOD595: Lakeside requested Condition #14 of the Order of Approval for NOC# 05NOC439 be revised to eliminate PM₁₀ from the list of pollutants requiring testing. ORCAA staff reviewed this request and found no supporting reasons for requiring PM₁₀ in addition to the federally required PM testing required by 40 CFR Part 60, Subpart I. Since PM₁₀ is a fraction of total PM emissions, PM₁₀ can be calculated based on PM test results. As a result, the requirement for PM₁₀ testing was determined unnecessary and was removed.

NOC# 08MOD642: Minor errors in the Order of Approval for NOC# 08MOD595 were corrected. These corrections had no implications on emission limits or overall emission rates from the plant, but were necessary to clarify monitoring, testing and reporting requirements. The following amendments were made:

Condition #3b: Amended to be consistent with how Lakeside was actually monitoring output of the plant. Originally, the facility was required to monitor aggregate feed rate for ensuring that the plant operated at or below the production rate it tested at, and verified to be in compliance with emissions limits. However, the production rate indicator monitored and preferred by Lakeside is the asphalt production rate. Therefore, the term "aggregate feed rate" in Condition 3b was changed to "asphalt production rate".

Condition #7: This condition established a particulate emissions concentration limit for the drum dryer (0.02 gr/dscf). However, correction to a standard excess oxygen level was inadvertently left out of the condition. Correcting concentration limits to a standard

excess oxygen level of 15% is typical for drum dryers. In addition, results from the initial stack test report dated August 15, 2008 indicate that the drum dryer was in fact operating at 15% excess oxygen. Based on this result, and since the typical correction for drum dryers is to a standard of 15% excess oxygen, condition #7 was revised by adding a 15% excess oxygen correction factor to the particulate limit.

Condition #10: This condition established NO_x and CO operating limits. However, the condition did not specify whether the limits were in terms of “dry” or “wet” concentration units. For the initial stack test, NO_x and CO concentrations were automatically measured in dry units per the required test methods. For sake of being consistent with the reference test methods, Condition #10 was revised by specifying that the NO_x and CO limits are in “dry” concentration units.

Table 1. Permitting History with ORCAA

Permit # (date)	Description	Status
05NOC439 (May 31 st , 2006)	Establish a hot mix asphalt plant. 300,000 tons per 12-month production limit established, and prohibited the use of RAP.	Superseded by 08MOD595
08MOD595 (May 14 th , 2008)	Removal of PM ₁₀ from the list of pollutants requiring testing.	Superseded by 08MOD642
08MOD642 (January 12 th , 2009)	Correction of minor errors in the Order of Approval. No implications on emission limits or emission rates.	Active

4. Facility Description

Lakeside received approval from ORCAA in May of 2006 to install and operate the hot mix asphalt (HMA) plant within the existing Holroyd Company Nisqually gravel mine near the Old Pacific Highway on Durgin Road in the Nisqually Valley. The HMA plant is a counter-flow drum mix HMA plant that has the capability to produce a maximum of 400 tons per hour of HMA. The plant combusts natural gas to provide heat to the drum dryer. The plant is equipped to add recycled asphalt pavement (RAP) to the mix, but is explicitly prohibited from doing so per condition #3(a) in the Order of Approval for NOC# 08MOD642. Air pollutant emissions from the drum dryer, storage silos and elevator are controlled by a cyclone separator followed by a baghouse. Truck loading emissions are controlled by a “Blue Smoke Odor Capture System” dedicated to capture and control fugitive emissions resulting from asphalt truck loading.

Drum Dryer

The rotary drum dryer is the largest source of air pollutant emissions of the plant. The purpose of the dryer is to heat and dry the aggregate, and to mix the dried aggregate with the liquid asphalt cement. Air pollutants are generated in the dryer by combustion of fuel (natural gas or propane) used to heat the aggregate, volatilization of organic compounds in the liquid asphalt cement, and fine particulate liberated from the aggregate as it passes through the dryer. Dryer emissions consist of water vapor, oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), volatile organic compounds (VOC), and fine particulate matter PM₁₀, various toxic air pollutants (TAP) and various hazardous air pollutants (HAP).

The drum dryer is a counter-flow design whereby the direction of the aggregate is opposite of the direction of the hot exhaust gases. Aggregate enters the drum dryer at the exhaust end of the dryer, and is heated and dried as it travels the length of the dryer. The combustion zone of the dryer is separated from the mixing zone by a barrier wall that transfers the hot aggregate from the combustion zone to the mixing zone by use of transfer sweeps. Keeping the mixing zone separate from the combustion zone is desirable from an air pollution control standpoint since it prevents direct flame contact with the liquid asphalt cement.

Lakeside recycles dust captured by both the cyclone and baghouse back into the aggregate mix. This is accomplished by adding the reclaimed dust into the drum dryer. Particulate enters the dryer through the inlet assembly designed to introduce RAP and reclaimed dust into the mixing zone of the dryer.

Special “sweeps” in the dryer cause the hot aggregate to be dropped directly on the incoming dust. This action allows heating of the material without direct flame contact thereby minimizing volatilization of organic compounds some of which are TAP and/or HAP. Because the liquid asphalt cement, virgin aggregate, and recycled dust from pollution control equipment are mixed in a zone removed from the combustion zone in the dryer, counter-flow plants generally have lower organic emissions compared to parallel flow drum mix plants.

Exhaust air from the dryer passes through a cyclone separator and then a baghouse filtration unit prior to exiting to the atmosphere. The cyclone separator is a mechanical separation device that removes the larger particulate material from the exhaust stream by maintaining cyclonic airflow conditions. The cyclone is expected to remove the majority (approximately 70%) of the filterable particulate matter in the exhaust from the dryer. Particulate material captured by the cyclone is removed from the cyclone hopper through an air lock, and then conveyed back to the drum dryer where it is recycled back into the aggregate in the mixing zone of the dryer as described above.

After passing through the cyclone the exhaust immediately enters the baghouse where it is filtered. The baghouse is a reverse air type baghouse (Ultraflo Model No. CFS-182) manufactured by GENCOR Industries Inc. The baghouse is capable of particulate removal efficiencies upwards of 99%. After passing through the baghouse, exhaust is emitted to the atmosphere through the baghouse exhaust stack. Emission limits on the drum dryer were established by ORCAA through the Approval Order for NOC# 05NOC439.

Hot Mix Elevator and Silos

The HMA elevator and storage silos are a source of emissions of volatile organic compounds including TAP, HAP and particulates. These emissions result from the volatilization of organic constituents from the HMA into the airspace directly above the product while it is conveyed into the silos, and while stored for short periods of time prior to loading into transport trucks. The plant will be equipped with an air pollution control system referred to by the manufacturer as a “Blue Smoke Odor Capture System” to address these emissions. This capture system consists of a “scavenging” fan and ducting that will enable capture and transport of gases from the headspace of the silos and HMA elevator to the combustion zone of the dryer where

organics will be incinerated. In addition, this system will induce and capture emissions from the mixing zone of the dryer. Since the silos and HMA elevator are covered and vented back to the drum dryer, emissions are ultimately controlled in the dryer and by the dryer add-on control devices.

Liquid Asphalt Storage Tanks

Lakeside operates three liquid asphalt storage tanks. Liquid asphalt cement needs to be stored at temperatures at or above 300° F to remain in a fluid state suitable for the HMA manufacturing process. Therefore, the liquid asphalt storage tanks need to be heated. The tanks are insulated and indirectly heated by a single hot-oil heater unit. Emissions from liquid asphalt storage tanks result from venting of gases from the tank headspace during daily temperature and pressure fluctuations. Emissions also result when a tank is filled and vapors within the tank are displaced by liquid asphalt. To control volatile organic emissions from the liquid asphalt storage tanks, vents on all three tanks are equipped with condensing filters that condense and reclaim the majority of the organic vapors in the vent exhaust.

Liquid Asphalt Tank Heater

Tank heating is accomplished using a 2 MMBtu/hr hot oil heater that circulates a heat transfer fluid (thermal oil) through the liquid asphalt storage tanks. Emissions from the heater originate from combustion of natural gas.

Fugitive Emissions

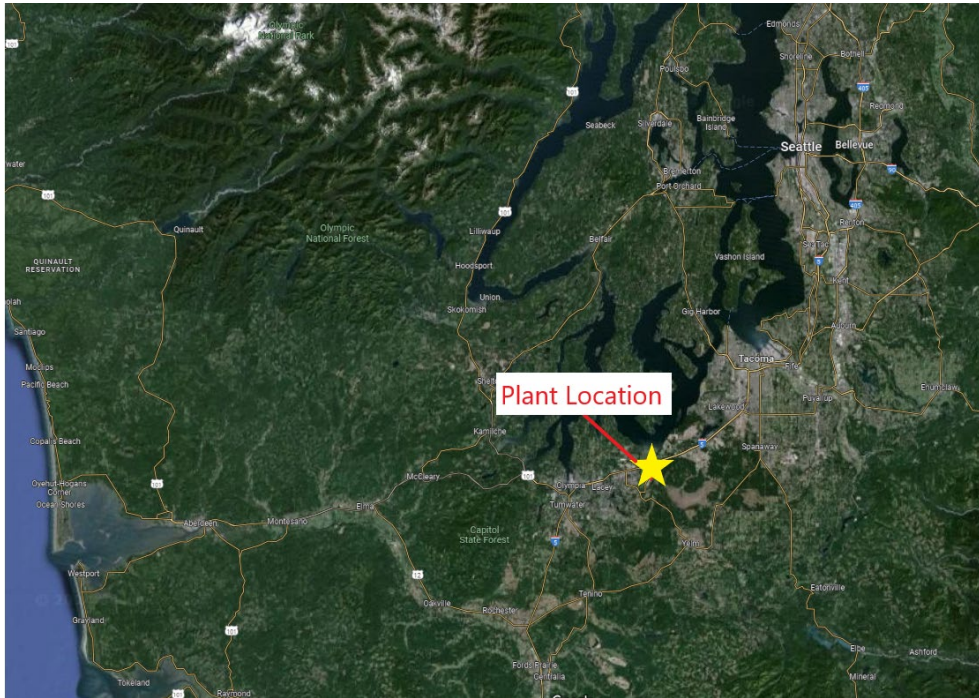
Emissions not captured by exhaust systems, referred to as “fugitive emissions”, include emission of dust from roadways, aggregate handling operations, and volatile emissions when HMA product is loaded into transport trucks.

Table 2: Existing Equipment

Generating Equipment	Category & Emissions	Control Devices/Method
<p>Drum Dryer</p> <ul style="list-style-type: none"> Gencor Industries Ultraplant 400 44 ft long approx 10 ft diameter Counterflow rotary drum dryer 400 tons per hour max production GENCO Ultra II-135 Oil/Gas/LP burner Recycle Asphalt Inlet Assembly 	<p>Emissions Unit</p> <p>NOx CO PM VOC TAP & HAP</p>	<ul style="list-style-type: none"> Cyclone Baghouse Counter-flow dryer design Use of natural gas Blue Smoke & Odor Capture System
<p>Asphalt Slat Conveyor</p> <p>Gencor Industries Ultraplant 400</p>	<p>Emissions Unit</p> <p>CO PM VOC TAP & HAP</p>	<p>Conveyor fully enclosed and ducted to drum dryer burner inlet</p>
<p>Storage Silos</p> <p>300-ton deluxe silos</p>	<p>Emissions Unit</p> <p>CO PM VOC TAP & HAP</p>	<ul style="list-style-type: none"> Silos fully enclosed and vented to the asphalt conveyor. “Blue Smoke and Odor Capture System”
<p>Vertical Cyclone</p> <ul style="list-style-type: none"> Initial control device serving the drum dryer 	<p>Control Device</p>	<p>Baghouse</p>

<ul style="list-style-type: none"> Removes 75% of dust in exhaust Dust return system returns captured dust back to the mixing zone of the dryer. 		
<p><u>Baghouse</u></p> <ul style="list-style-type: none"> GENCOR Ultraflo, Model No. CFS-182 89,217 CFM at 4.92:1 air-to-cloth ratio 1050 bags with a total cloth area of 18,134 sq ft Pulse air cleaning system Baghouse fines catch returned to drum dryer inlet assembly. 	Control Device	None-The baghouse stack is the main emission point of the plant.
<p><u>Blue Smoke Odor Capture System</u></p> <p>15 hp scavenging fan mounted on asphalt slat conveyor pulls smoke and fumes from conveyor, silos, and mixing zone of drum dryer and routes these pollutants to burner air inlet.</p>	Control Device	<ul style="list-style-type: none"> Cyclone Baghouse Smoke and fumes combusted in the dryer exhaust to the cyclone and then to the baghouse.
<p><u>Thermal Fluid Heater</u></p> <p>Model HYFGO/LP Vaporized LP-2000 rated at 2.0 MMBtu/hr</p>	Insignificant Emission Unit NOx, CO, PM, SO2, VOC, TAP, HAP	None
<p><u>Aggregate System</u></p> <ul style="list-style-type: none"> 10 ft by 14 ft, eight-bin, cold feed system 5 ft by 14 ft double-deck aggregate vibrating screen Aggregate scale conveyor (30 in by 90 ft, 20 hp drive) 	Insignificant Emission Unit PM	None.
<p><u>Tanks</u></p> <ul style="list-style-type: none"> Anti-strip Additive System 35,000 vertical liquid asphalt tank (2) 20,000 gallon vertical liquid asphalt tanks 	<u>Insignificant Emission Unit</u> VOC, TAP, HAP	Liquid asphalt tanks equipped with vapor collectors

Figure 1: Facility Location



*Imagery ©2024 Airbus, CNES/Airbus, Maxar Technologies, USDA/FPAC/GEO, Map data ©2024
** Annotated by ORCA

Figure 2: Site Map



* Imagery ©2024 Airbus, CNES/Airbus, Maxar Technologies, USDA/FPAC/GEO, Map data ©2024
** Annotated by ORCA

Lakeside Durgin reports material processing information each year as part of ORCAA’s emission inventory program. The emissions below are for reporting year 2022.

Table 3. Actual Emissions for Calendar Year 2022

Pollutant	Classification (Criteria ^a /HAP ^b /TAP ^c)	Annual Emissions	Units
PM (Total Particulate)	Contains Criteria	1	Tons/Year
PM ₁₀ (Total Particulate) (<= 10 µm)	Criteria	0.3	Tons/Year
PM _{2.5} (Fine Particulate (<=2.5 µm))	Criteria	0.2	Tons/Year
VOC ^d (Volatile Organic Compounds as VOC)	Criteria (Precursor to ozone)	2	Tons/Year
SO ₂ (Sulfur Dioxide)	Criteria	0.2	Tons/Year
NO _x (Nitrogen Oxides)	Contains Criteria	2	Tons/Year
CO (Carbon Monoxide)	Criteria and TAP	8	Tons/Year
Hazardous Air Pollutants (total HAP)	HAP	0.1	Tons/Year
Benzene (CAS# 71-43-2)	TAP and HAP	48	Lbs/Year
Ethylbenzene (CAS# 100-41-4)	TAP and HAP	29	Lbs/Year
Formaldehyde (CAS# 50-00-0)	TAP and HAP	0.05	Lbs/Year
Methyl Chloroform (CAS# 71-55-6)	TAP and HAP	6	Lbs/Year
Hexane (CAS# 110-54-3)	TAP and HAP	113	Lbs/Year
2,2,4-Trimethylpentane (CAS# 540-84-1)	HAP	5	Lbs/Year
Toluene (CAS# 108-88-3)	TAP and HAP	18	Lbs/Year
Total PAH HAP	HAP	23	Lbs/Year
Xylene (CAS# 1330-20-7)	TAP and HAP	25	Lbs/Year

^a EPA has established national ambient air quality standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as “criteria” air pollutants (or simply “criteria pollutants”).

^b HAP means Hazardous Air Pollutant. Hazardous Air Pollutants are those known to cause cancer and other serious health impacts and are regulated under the federal Clean Air Act.

^c TAP means any toxic air pollutant regulated in Washington and listed in WAC 173-460-150.

^d VOC is regulated as a Criteria Air Pollutant because it is a precursor to Ground Level Ozone (O₃)

5. Requested Revisions

Lakeside proposes to use up to 40% reclaimed asphalt pavement (RAP) as raw material when producing asphalt at the facility, and as a result, is requesting ORCAA to revise the Order of Approval for NOC# 08MOD642 to eliminate the condition prohibiting the use of RAP. In the reclamation process, old asphalt pavement is removed from the road base and transported to the plant. The planned changes to the facility are to allow for the addition of RAP to the asphalt mixes produced by the facility. These changes include installation and use of a:

- Covered structure where RAP will be stored.
- RAP feed bin; a wheeled front end loader will be used to move the RAP from the covered storage pile and deposit it into the RAP feed bin.
- Conveyor that will receive RAP from the bottom of the RAP feed bin and direct it into a mixing chamber in the drum that is designed specifically to receive RAP. Because the HMA plant was originally designed and constructed to incorporate RAP into the asphalt

mixes, no modifications to the facility’s drum/dryer mixer are necessary to accommodate this change.

- Crusher to process RAP. For RAP to replace a portion of the aggregate used for HMA production, it must be crushed and screened to a size that can be effectively introduced into the drum/dryer mix. Lakeside proposes to use a portable crusher that will visit the facility periodically, and already operates under a General Rock Crusher Approval Order issued by ORCAA. Therefore, emissions from the crushing operations will not be reviewed as part of this permitting action.

According to the NOC application, the processes listed above are only expected to generate negligible amounts of dust. *“This is because the [asphalt cement] used to create the HMA that becomes RAP encapsulates any fines present in the aggregate that was used to produce the HMA. These encapsulated fines are not prone to entrainment and, therefore, RAP crushed to the size used for HMA production is not a source of fugitive dust.”*(Application Add. 1, Page 2).

6. Evaluation of Requested Revisions

The following describes ORCAA’s conclusions with respect to approval criteria for revisions under Rule 6.1.11:

Criterion #1: The change/revision will not cause the source to exceed an emissions standard. Emissions from the drum/dryer are expected to *decrease* as a result of this proposal. Using RAP reduces the amount of virgin aggregate that goes through the drum dryer per ton of product produced. Every ton of RAP that is added precludes a ton of aggregate that must go through the dryer and associated emissions. Additionally, the control technology currently used at the facility will remain unchanged. Therefore, ORCAA believes this criterion is met as emissions will not increase.

Project emissions for the planned changes are expected to only originate from the handling of RAP as described in earlier in Section 5. Additionally, it’s worth noting that handling RAP is expected to produce less fugitive dust compared to handling aggregate. Landau Associates (Landau) provided PTE calculations in an application addendum. PTE calculations were based on the drop equation (Equation 1) from AP-42, Chapter 13.2.4 (11/06). Details on the emission calculations can be found in the NOC application.

Criterion #2: No ambient air quality standard or PSD increment will be exceeded.

Table 3 evaluates expected increases associated with handling and transferring RAP material. The expected emission rates are insignificant, and not expected to cause or contribute to a violation of an ambient air quality standard or exceedance of a PSD increment.

Table 3. Emission Increases (Project Emissions)

Pollutant	Classification (Criteria ^a /HAP ^b /TAP ^c)	Emission Rate (tons/yr)
PM (Total Particulate)	Contains Criteria	0.16
PM ₁₀ (Total Particulate) (<= 10 µm)	Criteria	0.074
PM _{2.5} (Fine Particulate (<=2.5 µm))	Criteria	0.011

^a EPA has established national ambient air quality standards (NAAQS) for six of the most common air pollutants— carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as “criteria” air pollutants (or simply “criteria pollutants”).

^b HAP means Hazardous Air Pollutant. Hazardous Air Pollutants are those known to cause cancer and other serious health impacts and are regulated under the federal Clean Air Act.

^c TAP means any toxic air pollutant regulated in Washington and listed in WAC 173-460-150.

^d VOC is regulated as a Criteria Air Pollutant because it is a precursor to Ground Level Ozone (O₃)

Criterion #3: The change will not adversely impact the ability of the Agency to determine compliance with emissions standards.

The revision will not affect monitoring, testing, or reporting requirements already established in the air permit. Therefore, this criterion is considered met.

Criterion #4: The revised Air Permit continues to require BACT as determined at the time of the original approval.

The removal of the RAP prohibition condition will not affect any BACT limits or conditions requiring emissions control to meet BACT as determined in the original air permits already issued. Therefore, this criterion is considered met.

Criterion #5: The revised Air Permit will continue to meet any applicable requirements established previously through the New Source Review (NSR) process, as applicable. In other words, the revised Air Permit must not undo any applicable requirements established in the current Air Permit.

The RAP prohibition condition was incorporated into the original air permit approving this facility, NOC# 05NOC439, due to SEPA-related requirements at that time. ORCAA can't approve a new source of air pollution that has not met requirements for environmental review under the State Environmental Policy Act (SEPA) or does not conform to the conditions established through SEPA. Because of this, ORCAA established several conditions in the Order of Approval NOC# 05NOC439 for Lakeside that aligned the air permit so that it was consistent with the operations approved by Thurston County. One of those conditions was the prohibition to use RAP. On September 29, 2023, Thurston County issued a Determination of Nonsignificance (DNS) for Lakeside's proposal to process RAP. This action by the County eliminated the need to have the RAP prohibition in the NOC, and therefore is no longer considered an applicable requirement. All other applicable NSR requirements will remain unchanged. Therefore, this criterion is considered met.

Criterion #6: If the original Air Permit was issued for a replacement or substantial alteration of air pollution control technology under ORCAA Rule 6.1.10, the revised Air Permit will continue to meet any applicable requirements established through Rule 6.1.10.

The original air permit was issued to conditionally approve the plant, with subsequent revisions to the approval order (see Table 1). Therefore, this criterion does not apply to this revision. However, it's worth noting that the applicable requirements related to required air pollution control technology will remain unchanged.

7. Administrative Requirements for Air Permit Revisions

Air Permit revisions are subject to the administrative requirements under Rule 6.1.11. Per this rule, requests for revisions must be initiated by filing a complete application on forms provided by ORCAA and shall follow the same procedures and timelines as required for Notice of Construction (NOC) applications under Rule 6.1.2. They are also subject to the public involvement requirements in Rule 6.1.3 and fee requirements in Rule 3.3.

Per ORCAA Rule 6.1.3, applications are subject to a 15-day public notice and an opportunity to request a 30-day public comment period and opportunity for a public hearing on the proposed revision. Public notice of Lakeside’s NOC application was posted on ORCAA’s website on March 11th, 2024. The time period for filing comments on the application and requests for a public comment period expired on March 26th, 2024. No comments on the NOC application or requests for a public comment period or hearing were received during the NOC application noticing period. Based on this result, neither a public comment period nor public hearing were initiated.

8. SEPA Review

The State Environmental Policy Act (SEPA) under Chapter 197-11 WAC is intended to provide information to agencies, applicants, and the public to encourage the development of environmentally sound proposals. The goal of SEPA is to assure that significant impacts are mitigated.

Thurston County issued a Determination of Nonsignificance (DNS) on September 29, 2023 for Lakeside’s proposal to process RAP.

9. Title V Air Operating Permit (AOP Implications)

The State of Washington program pursuant to Title V of the federal Clean Air Act is governed under Chapter 173-401 WAC, the Washington Air Operating Permit Program. Chapter 173-401 WAC requires existing major stationary sources to operate in compliance with an approved Air Operating Permit (AOP). Major stationary sources are those stationary sources with a potential to emit which is greater than 100 tons per year of any criteria pollutant, greater than 10 tons per year of any hazardous air pollutants (HAP), or greater than 25 tons per year of any combination of HAP.

In its original NOC application for NOC# 05NOC439, Lakeside requested ORCAA to establish a 700,000-ton annual production limit on the plant. The annual production limit was proposed by Lakeside in order to classify the plant as a “minor” source of air pollution with respect to the AOP program. Thurston County’s approval limited Lakeside to 300,000 tons per 12-consecutive month period and this limit was incorporated into Condition 3(g) of ORCAA’s Order of Approval.

Therefore, Lakeside is not a “Major Source” under the Title V program and is not subject to the requirement to operate under an AOP.

10. Revised Conditions of Approval

The following conditions of approval were originally approved under NOC# 05NOC439 when the facility was approved, and amended most recently by NOC# 08MOD642. The conditions are amended to reflect proposed revisions as shown. Amended language in each condition is shown in “red” colored edits. Deleted text is identified by strike out (Strike Out). Added text is underlined (Underlined). Additionally, the regulatory bases in NOC# 08MOD642 were carried over and only revised as necessary to reflect current regulation citations. The final revised Order of Approval (Revised Air Permit) issued by ORCAA will not show these edits and will supersede NOC# 08MOD642.

1. Fugitive Emission Control Requirements: Reasonable and appropriate precautions must be taken as necessary to prevent fugitive emissions from becoming a nuisance or violating an emission standard or requirement. Reasonable precautions include, but are not limited to, the following:

- a) Taking appropriate measures to prevent the track out of dirt and debris onto public rights-of-way and roads.
- b) Paving the access road from the County road to the asphalt plant within 30-days from commencing operation of the plant.
- c) Cleaning the paved access road of dust and debris when necessary to prevent fugitive dust from vehicle traffic.
- d) Applying water spray or another ORCAA-approved dust suppressant to unpaved areas, when necessary, to prevent fugitive dust from vehicle traffic associated with operation of the asphalt plant.
- e) Adopting and enforcing a plant site speed limit of five (5) miles per hour for unpaved roads within the site.
- f) Maintaining enclosures and covers on the hot mix elevator and storage silos.
- g) Maintaining the dryer, elevator and storage silos under a negative pressure when operating.
- h) Covering asphalt loads during transport.
- i) Installing, maintaining and operating a control system capable of capturing and controlling fugitive emissions from asphalt truck load out operations.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1); ORCAA Rule 8.3(c) and 8.5; WAC 173-400-040]

2. Compliance with Nuisance-Air Prohibitions: Lakeside shall minimize emissions to levels that assure compliance with applicable nuisance-air prohibitions including, but not limited to, nuisance-odor prohibitions in ORCAA Rule 8.5(c), and fallout prohibitions in ORCAA Rule 8.3(e). Lakeside shall devise a plan to implement additional emissions control measures if more than one notice of violation (NOV) of the same nuisance regulation is issued to Lakeside in any month. The plan shall describe proposed control measures and shall include a schedule for their implementation. Upon ORCAA's approval, the plan shall be implemented according to the schedule approved by ORCAA.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1); ORCAA Rule 8.5(c) and 8.3(e)]

3. Operational Requirements and Limits: The following operational requirements apply:

- a) Aggregate shall not contain any petroleum-contaminated soils, ~~or recycled asphalt product.~~
- b) The asphalt production rate in terms of pounds or tons of asphalt produced per hour shall not exceed the hourly rates the plant operated during the most recent compliance source test unless prior approval is given by ORCAA.
- c) The asphalt production rate of the drum dryer shall not exceed 300 tons per hour (daily average).
- d) Lakeside shall install and maintain a differential pressure gage across the baghouse filters.

- e) The dryer shall not be operated unless the baghouse is on-line, and fully operational. The term “fully operational” shall mean that the baghouse has been maintained and is operating in accordance with requirements contained in the O&M plan described below.
- f) Idling or parking of asphalt trucks, whether empty or loaded along Durgin Road, old Pacific Highway or within a 300-foot radius around the entrance to the gravel mine shall be prohibited.
- g) Annual production of hot mix asphalt product shall not exceed 300,000 tons in any twelve (12) consecutive month period.
- h) Only ORCAA-approved release-agents that do not emit volatile organic compounds at ambient temperatures, such as vegetable oil or surfactants, may be used.
- i) The asphalt plant, silos and other ancillary equipment shall be consistent with specifications of the asphalt plant as approved by Thurston County.

[Regulatory Basis: ORCAA Rule 6.1.12; WAC 173-400-091]

4. **Federal New Source Performance Standard for Asphalt Plants:** Lakeside shall comply with the requirements of 40 CFR Part 60, Subpart A and Subpart I.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1); 40 CFR Part 60, §60.90]

5. **Baghouse Stack Opacity:** Emissions from the baghouse exhaust stack shall not exceed five percent (5%) opacity (six-minute average) as determined in accordance with EPA Method 9.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2)]

6. **Silo and Elevator Fugitive Leaks:** There shall be no visible fugitive emissions from the elevator or silos in excess of five percent (5%) opacity (any three minutes in a 60-minute period) as determined in accordance with Ecology Method 9A.

[Regulatory Basis: ORCAA Rule 8.8 and WAC 173-400-040(3)]

7. **Particulate Limit:** Filterable particulate emissions from the baghouse exhaust stack shall not exceed 0.02 grains per dry standard cubic foot of exhaust corrected to 15% oxygen (gr/dscf @ 15% O₂). When required, compliance shall be demonstrated in accordance with EPA Method 5 (40 CFR Part 60, Appendix A) and the procedures in §60.93(b)(1).

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2)]

8. **Dryer Fuel Specifications:** The drum dryer shall combust natural gas or propane and shall not begin operating until natural gas supplies are available to the plant. Diesel may be used up to 500 hours per 12-month period as a back-up fuel only when natural gas supplies are disrupted, provided that the diesel contain no more than 0.05% sulfur by weight. Combustion of waste oil shall be prohibited.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2) ; WAC 173-400-113(2)]

9. **O&M Plan:** Lakeside shall develop and implement an Operations and Maintenance (O&M) plan for minimizing and controlling fugitive dust and maintaining pollution control equipment. The O&M plan shall be kept in a manual on site and made available to plant operators. At a minimum, the O&M plan shall contain the following:

- a) Standard procedures, criteria and prescribed frequency for inspecting and cleaning vehicles prior to leaving the site and for cleaning any track-out of dirt and debris.
 - b) Designated person at the plant for responding to and resolving air emissions related complaints.
 - c) Schedule and standard procedures for monitoring and maintaining the dryer including the dryer seals, burner, transfer points and other dryer components critical to air pollution control.
 - d) Schedule and standard procedures for monitoring and maintaining the baghouse including monitoring the baghouse pressure drop, monitoring visual emissions from the baghouse, periodic internal inspection of the baghouse and standard procedures for bag replacement.
 - e) Prescribed acceptable operating range for the baghouse pressure drop.
 - f) A schedule and procedures for conducting baghouse leak checks.
 - g) Criteria and procedures for replacing bags that are worn or damaged.
- [Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); ORCAA Rule 8.8]*

10. Dryer Burner Maintenance: Lakeside shall annually inspect and service the dryer burner to maintain optimal combustion conditions in the dryer. Optimal combustion conditions shall include criteria that NO_x and CO at the exhaust exit of the dryer are maintained to concentrations less than or equal to 60 and 480 parts per million by volume, dry (ppmvd), respectively, and standardized to 15% O₂.

[Regulatory Basis: ORCAA Rules 6.1.4(a)(2); WAC 173-400-113(2); ORCAA Rule 8.8]

11. Monitoring: The following shall be monitored:

- a) Composition of, and toxic ingredients in fuels, liquid asphalt cement and release agents shall be monitored for conformance with the applicable limits in this Order of Approval at the time of purchase or prior to acceptance by reviewing Material Safety Data Sheets (MSDS) or other documents certifying the material or fuel composition.
- b) The rate of asphalt produced in terms of tons per hour shall be monitored continuously. The monitoring systems shall be inspected and calibrated at least annually. A visible display of the hourly asphalt production rate shall be provided in the control house.
- c) The total cumulative amount of asphalt produced shall be monitored in terms of tons produced per month and consecutive 12-month period.
- d) The total cumulative amount natural gas and propane combusted by both the drum dryer and liquid asphalt heater shall be monitored.
- e) Pressure drop across the baghouse shall be monitored continuously. A visual display of the baghouse pressure drop shall be provided either in the control room or on the baghouse itself at a location readily discernable from ground level.

[Regulatory Basis: ORCAA Rules 6.1.4(a)(2) ; WAC 173-400-113(2); ORCAA Rule 8.8]

12. Recordkeeping: The following records shall be maintained for at least five years from the date of origination and reported to ORCAA upon request:

- a) Complaints received.
- b) Current Material Safety Data Sheets (MSDS) for fuels used, the liquid asphalt cement and release agents used.
- c) The amount in tons of asphalt produced per month.
- d) Sales invoices for asphalt sold.

- e) Record of baghouse pressure drop readings in accordance with the O&M plan.
- f) Fuel certification records for diesel fuel used in the dryer.
- g) The amount of diesel combusted by the drum dryer in gallons.
- h) The amount of natural gas and propane combusted in therms or a similar unit of measure per month.
- i) Dryer maintenance records
- j) Written report from dryer service contractor of findings from dryer inspections including measured combustion indicators such as NO_x and CO concentrations and percent oxygen.
- k) A copy of this Regulatory Order shall be kept on site and made available to plant operators.
- l) Record of the asphalt production rate in terms of tons per hour.

[Regulatory Basis: ORCAA Rule 8.11]

13. Complaints: The phone number of the on-site Lakeside representative responsible for taking and responding to air quality-related complaints shall be posted at the entrance to the mining site on a sign readily readable from passersby on Durgin Road.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1); ORCAA Rule 8.5(c)]

14. Testing: Lakeside shall conduct testing to determine compliance with federal opacity and grain loading standards, compliance with the opacity and grain loading limits of this approval order, and pollutant emission factors in terms of pounds of pollutant per ton of asphalt produced for oxides of nitrogen (NO_x), carbon monoxide (CO), total particulate matter, and volatile organic compounds (VOC) emitted by the drum dryer. Testing shall be conducted within 60 days after achieving the maximum production rate at which the plant will be operated, but not later than 180 days after initial startup of the plant, and at such other times as may be required by ORCAA. Stack testing shall be conducted in accordance with the methods contained in Appendix A of 40 CFR Part 60 and with the requirements in this Regulatory Order. In addition, the following shall be required:

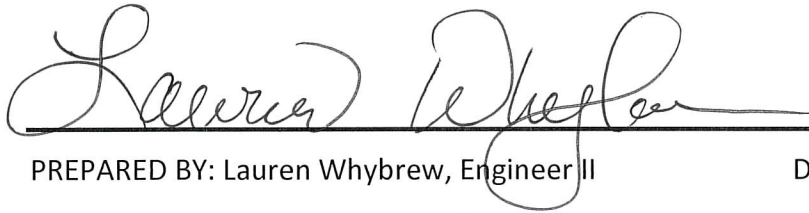
- a) Lakeside shall provide safe sampling ports and platforms that meet the requirements of Method 1 in 40 CFR Part 60, Appendix A.
- b) The total particulate emission factor shall reflect the “back half catch” in accordance with EPA Reference Methods 5 and 202.
- c) A test plan shall be submitted to ORCAA for approval at least 30 days prior to conducting the test.
- d) Written results of all testing shall be submitted to ORCAA within 60 days from completing the test.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1); 40 CFR Part 60, §60.90]

11. Final Determination to Approve Air Permit Revisions

This Final Determination documents ORCAA staff’s determinations with respect to the applicable criteria of approval in ORCAA Rule 6.1.11. ORCAA staff recommends approval of Lakeside’s proposed revision to remove the prohibition to use RAP, provided the revised conditions identified in Section 10 of this Final Determination are implemented through an enforceable Order of Approval (AKA: Air Permit) superseding NOC# 08MOD642.

~ end of section ~

 4/24/2024
PREPARED BY: Lauren Whybrew, Engineer III Date

 4/24/2024
REVIEWED BY: Jennifer DeMay, PE Date

OLYMPIA REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

FORM 1- NOTICE OF CONSTRUCTION

TO CONSTRUCT - INSTALL - ESTABLISH OR MODIFY AN AIR CONTAMINANT SOURCE

Form 1 Instructions:

1. Please complete all the fields below. **This NOC application is considered incomplete until signed.**
2. If the application contains any confidential business information, please complete a Request of Confidentiality of Records (www.orcaa.org/forms).
3. Duty to Correction Application: An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information.

Business Name: <p style="text-align: center;">Lakeside Industries, Inc.</p>	For ORCAA use only File No: 291 County No: 67 Source No: 150 Application No: 24NOC 1632
Mailing Address: <p style="text-align: center;">PO Box 7016, Issaquah, WA 98027</p>	Date Received: Received JAN 17 2024 ORCAA
Physical Address of Project or New Source: <p style="text-align: center;">11125 Durgin Rd SE, Olympia, WA 98513</p>	
Billing Address: <p style="text-align: center;">PO Box 7016, Issaquah, WA 98513</p>	
Project or Equipment to be installed/established: Installation of feed hopper and conveyor at existing asphalt plant facility covered under ORCAA Order of Approval 08MOD642, and modification to 08MOD642 Condition 3.(a), to allow for asphalt recycling.	
Anticipated startup date: 2 / 12 / 2024 Is facility currently registered with ORCAA? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
This project must meet the requirements of the State Environmental Policy Act (SEPA) before ORCAA can issue final approval. Indicate the SEPA compliance option: <input checked="" type="checkbox"/> SEPA was satisfied by <u>Thurston County</u> (government agency) on <u>9 / 29 / 2023</u> (date) - Include a copy of the SEPA determination <input type="checkbox"/> SEPA threshold determination by _____ (government agency) is pending - Include a copy of the environmental checklist <input type="checkbox"/> ORCAA is the only government agency requiring a permit - Include ORCAA Environmental Checklist <input type="checkbox"/> This project is exempt from SEPA per _____ (WAC citation).	
Name of Owner of Business: Jaime Lee	Agency Use Only CONDITIONALLY APPROVED FOR CONSTRUCTION ONLY IN ACCORDANCE WITH RCW 70A.15, WAC 173-400 ORCAA REGULATIONS (SEE ATTACHED ADDENDUM FOR CONDITIONS OF APPROVAL)
Title: President	
Email: <u>jaime.lee@lakesideindustries.com</u> Phone: (425) 313-2600	
Authorized Representative for Application (if different than owner):	
Title:	
Email: Phone:	
I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct.	
Signature of Owner or Authorized Representative: (sign in Blue Ink) 	DATE: <u>1-12-24</u> 4/24/2024
IMPORTANT: Do not send via email or other electronic means. ORCAA must receive Original, hardcopy, signed application and payment prior to processing application.	
ORCAA	