Air Quality
TIER II OPERATING PERMIT
and
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality

PERMIT NO.: T2-020031
Airs Facility No.: 777-00106
SIC: 3273 CLASS: SM
UTM Coordinate (km): PORTABLE

1. PERMITTEE
Idaho Concrete Co.

2. PROJECT
Tier II Operating Permit and Permit to Construct

3. MAILING ADDRESS
P.O. Box 789, 2755 E. State St.

4. FACILITY CONTACT
Eric St. Pierre

5. RESPONSIBLE OFFICIAL
Eric St. Pierre

6. EXACT PLANT LOCATION
Portable

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Production of ready-mix concrete

8. PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400-470 and IDAPA 58.01.01.220-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece of equipment. This permit will expire if construction has not yet begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 et seq.

DATE ISSUED: July 8, 2003
DATE EXPIRES: July 8, 2008

O. Stephen Adler, Director
Department of Environmental Quality
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<td>Department</td>
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1. **PERMIT SCOPE**

**Purpose**

1.1 The purpose of this permit is to limit PM10 emissions from this facility as part of the North Ada County PM10 Maintenance Plan.

1.2 This Tier II operating permit and permit to construct incorporates the following permit:


**Regulated Sources**

1.3 Table 1.1 lists all sources of emissions that are regulated in this permit.

<table>
<thead>
<tr>
<th>Permit Section</th>
<th>Source Description</th>
<th>Emissions Control(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.3</td>
<td>Cement storage silo</td>
<td>SIGM, SMM</td>
</tr>
<tr>
<td>1.4</td>
<td>All associated fugitive emissions from the following: sand and aggregate silos, weigh hopper loading, bulk stacking, vehicle traffic, and construction activities</td>
<td>Reasonable care</td>
</tr>
</tbody>
</table>
FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility:

<table>
<thead>
<tr>
<th>Permit Condition</th>
<th>Parameter</th>
<th>Permit Limit/Standard Summary</th>
<th>Applicable Requirements Reference</th>
<th>Monitoring/Record Keeping Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1</td>
<td>Fugitive dust</td>
<td>Reasonable control</td>
<td>IDAPA 58.01.01.660-561</td>
<td>2.2, 2.3, 2.4, 2.5, 2.13</td>
</tr>
<tr>
<td>2.8</td>
<td>Odors</td>
<td>Reasonable control</td>
<td>IDAPA 58.01.01.775-776</td>
<td>2.7, 2.13</td>
</tr>
<tr>
<td>2.6</td>
<td>Visible emissions</td>
<td>20% capacity for no more than three minutes in any 60-minute period</td>
<td>IDAPA 68.01.01.625</td>
<td>2.9, 2.13</td>
</tr>
<tr>
<td>2.10</td>
<td>Excess emissions</td>
<td>Compliance with IDAPA 58.01.01.130-139</td>
<td>IDAPA 68.01.01.130-139</td>
<td>2.13</td>
</tr>
<tr>
<td>2.12</td>
<td>Air stagnation advisory</td>
<td>Compliance with IDAPA 58.01.01.550-562</td>
<td>IDAPA 58.01.01.550-562</td>
<td>2.13</td>
</tr>
<tr>
<td>2.14</td>
<td>Open burning</td>
<td>In accordance with IDAPA 58.01.01.600-615</td>
<td>IDAPA 58.01.01.600-615</td>
<td>2.13</td>
</tr>
</tbody>
</table>

Fugitive Dust

2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.660-561. In determining what is reasonable, considerations will be given to factors such as the proximity of dust emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which emit dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to capture and control the handling of dusty materials. Adequate containment methods should be employed during handling or storage operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dust.
- Prior to entry and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.
2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (non-water, contain dust suppressants, etc.) to reasonably control fugitive emissions.

2.4 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.5 Visible emissions are a trigger that requires the initiation of a strategy or strategies to control fugitive dust emission from associated processes of a concrete batch plant such as weigh hopper, sand and aggregate transfer, truck mixing, paved and unpaved roads, and stockpiles. Emissions from any of the associated processes and roads shall not exceed 20% opacity for a period or periods aggregating more than one minute in any 60-minute period. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.


g.

2.6 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

2.7 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

2.8 The permittee shall not discharge any air pollutants to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by the procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and sulfur dioxide are the only reason(s) for the failure of the emission to comply with the requirements of this section.

2.9 The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a scenario-based evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable or perform a Method 6 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 10 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee
shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 59.04.01.430.136. The permittee shall maintain records of the results of each quarterly ambient air monitoring inspection and each quarterly test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time of the emissions are present (if observed); any corrective action taken in response to the emissions; and the date corrective action was taken.

**Excuse Emissions**

2.10. The permittee shall comply with the procedures and requirements of IDAPA 59.04.01.430 for excuse emissions due to startup, shutdown, scheduled maintenance, safety measure, acute, and breakdown.

**Reports and Certifications**

2.11. Any report required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83704

**Air Stagnation Advisory Days**

2.12. The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 59.04.01.559.560.

**Monitoring and Recordkeeping**

2.13. The permittee shall maintain sufficient recordkeeping to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not limited to the following: (a) the date, place, and times of sampling or measurement; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurements. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.
Open Burning

2.10 The permittee shall comply with the requirements of IDAPA 68.04.01.600.616, Rules for Control of Open Burning

Obligation to Comply

2.15 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

Relocation

2.40 At least 45 days prior to relocating any equipment covered by this permit, the permittee shall register all existing portable equipment using the Department's Portable Equipment Registration and Relocation Form (PERF) available on the Department's Website at: www.state.id.us/deq/air/equiprelocat.htm. Each PERF, along with a scaled plan of the relocation site, shall be mailed to the following address:

PERF Procession Unit
DEQ AIR Quality
1440 N. 8th St.
Boise, ID 83702-1055
3. CEMENT STORAGE SILO

3.1 Process Description

The purpose for the cement storage silo is to store cement for use in the production of concrete.

3.2 Control Description

Particulate matter emissions from the pneumatic loading of cement from a delivery truck to the cement storage silo are controlled by a baghouse.

Emissions Limits

3.3 Emissions Limits

Emissions of PM10 from cement silo loading shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

Operating Requirements

3.4 Throughput Limits

The maximum annual production of concrete shall not exceed 500,000 cubic yards per any consecutive 12-month period.

3.5 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for the cement storage silo baghouse describing the procedures that shall be followed to comply with General Provision 5.2 and the baghouse pressure drop requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.

3.6 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, a pressure drop monitoring device to measure the pressure differential across the cement storage silo baghouse.

3.7 Pressure Drop Across Air Pollution Control Device

The pressure drop across the cement storage silo baghouse shall be maintained within manufacturer and O&M manual specifications. Documentation of both manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to Department representatives upon request.
Monitoring and Recordkeeping Requirements

3.8 Operating Parameters

The permittee shall monitor and record the following information:

- Pressure drop reading across the cement storage silo baghouse once each time the cement storage silo is loaded.

- Concrete production in cubic yards per month and cubic yards per year. Monthly concrete production shall be summed over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 3.4.

These records shall be maintained in accordance with Permit Condition 2.13.
4. APPENDIX

<table>
<thead>
<tr>
<th>Source Description</th>
<th>Hourly PM$_{10}$ Emissions (lb/hr)</th>
<th>Annual PM$_{10}$ Emissions (T/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cement storage silo</td>
<td>3.7</td>
<td>0.5</td>
</tr>
<tr>
<td>All associated process emissions (fugitives included)</td>
<td></td>
<td>16.4</td>
</tr>
</tbody>
</table>

* As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department’s emissions estimation methods used in this permit analysis.

* As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

* Includes condensibles.
5. GENERAL PROVISIONS

5.1 All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101 et seq.

5.2 The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.

5.3 The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:

- To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit, and
- At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.

5.4 Except for data determined to be confidential under Section 6-342A Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.

5.5 Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.

5.6 In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.

5.7 This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.

5.8 The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.

5.9 The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.