Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT  

State of Idaho  
Department of Environmental Quality  

PERMIT NO.: T2-020033  
AIRS FACILITY NO.: 777-00151  
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  
TITLE: Operations Manager  

5. RESPONSIBLE OFFICIAL  
Eric St. Pierre  
TITLE: Operations Manager  

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 58.01.01.200-228. 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 or set 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, 2006  

C. STEELE, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY
| 1.  | PERMIT SCOPE                                                                 | 4 |
| 2.  | FACILITY-WIDE CONDITIONS                                                     | 5 |
| 3.  | CEMENT STORAGE SILO                                                          | 9 |
| 4.  | APPENDIX                                                                    | 11|
| 5.  | GENERAL PROVISIONS                                                           | 12|

Page 2 of 12
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AIRS</td>
<td>Aerometric Information Retrieval System</td>
</tr>
<tr>
<td>Department</td>
<td>Department of Environmental Quality</td>
</tr>
<tr>
<td>EPA</td>
<td>U.S. Environmental Protection Agency</td>
</tr>
<tr>
<td>IDAPA</td>
<td>a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act</td>
</tr>
<tr>
<td>km</td>
<td>kilometer</td>
</tr>
<tr>
<td>lb/hr</td>
<td>pounds per hour</td>
</tr>
<tr>
<td>O&amp;M</td>
<td>Operations and Maintenance</td>
</tr>
<tr>
<td>PM</td>
<td>particulate matter</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers</td>
</tr>
<tr>
<td>PTC</td>
<td>permit to construct</td>
</tr>
<tr>
<td>SIC</td>
<td>Standard Industrial Classification</td>
</tr>
<tr>
<td>SM</td>
<td>synthetic minor</td>
</tr>
<tr>
<td>T/yr</td>
<td>tons per year</td>
</tr>
<tr>
<td>UTM</td>
<td>Universal Transverse Mercator</td>
</tr>
</tbody>
</table>
1. PERMIT SCOPE

Purpose.

1.1 The purpose of this permit is to limit PM₁₀ emissions from this facility as part of the Northern 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>Emission Control(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Cement storage site</td>
<td>Baghouse</td>
</tr>
<tr>
<td>1.4</td>
<td>All associated fugitive emissions from the following: sand and aggregate transfer, weigh hopper loading, trucking, vehicle traffic, and wind erosion, dust piles.</td>
<td>Reasonable control</td>
</tr>
</tbody>
</table>
2. 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 or Standard Summary</th>
<th>Applicable Requirements Reference</th>
<th>Monitoring and Recordkeeping Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.4</td>
<td>Fugitive dust</td>
<td>Reasonable control</td>
<td>IDAPA 58.04.01.650.651</td>
<td>2.0, 2.1, 2.4, 2.5, 2.6, 2.7, 2.8</td>
</tr>
<tr>
<td>2.6</td>
<td>Odors</td>
<td>Reasonable control</td>
<td>IDAPA 58.04.01.776.776</td>
<td>2.7, 2.19</td>
</tr>
<tr>
<td>2.10</td>
<td>Visible emissions</td>
<td>20% opacity or less or more than three minutes in any 60-minute period</td>
<td>IDAPA 58.04.01.926</td>
<td>2.9, 2.19</td>
</tr>
<tr>
<td>2.10</td>
<td>Excess emissions</td>
<td>Compliance with IDAPA</td>
<td>IDAPA 58.04.01.100-150</td>
<td>2.14</td>
</tr>
<tr>
<td>2.12</td>
<td>Air contamination</td>
<td>Compliance with IDAPA</td>
<td>IDAPA 58.04.01.560-650</td>
<td>2.15</td>
</tr>
<tr>
<td>2.14</td>
<td>Open burning</td>
<td>Incineration with IDAPA</td>
<td>IDAPA 58.04.01.560-651</td>
<td>2.19</td>
</tr>
</tbody>
</table>

Fugitive Dust

2.4 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.04.01.650.651. 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 can create dust.
- Installation and use, where practical, of hoods, fans, and fabric-filter or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other similar material from streets, where practical.
2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action in 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 permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.4 The permittee shall conduct a weekly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each weekly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, 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 58.01.01.0525.

Odors

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 is valid, 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 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 pollutant 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 procedures contained in IDAPA 58.01.01.0525. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

3.0 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 visual air sampling at 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 2 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.0525. A minimum of 60 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 occurrence of its annual compliance certification
and in accordance with 1DADA 58.01.04.130.136. The permittees shall maintain records of the results of each
weekly visible emissions inspection and each opacity test when conducted. The records shall include, at a
minimum, the date and results of each inspection and test. A description of the following: the permittee's
assessment of the conditions existing at the time visible emissions are present; (if observed), any corrective
action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

2.40 The permittee shall comply with the procedures and requirements of 1DADA 58.01.04.130.136 for excess
emissions due to startup, shutdown, scheduled maintenance, safety measures, upset, and breakdowns.

Reports and Certifications

2.11 Any reporting 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
 1145 E. Grand
Boise, ID 83716

Air Stagnation Advisory Days

2.12 The permittee shall comply with the Air Pollution Emergency Rules in 1DADA 58.01.04.558.592.

Monitoring and Recordkeeping

2.13 The permittee shall maintain sufficient recordkeeping to ensure compliance with all 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

5.14 The permittee shall comply with the requirements of IDAPA 53.01.01-600-614, Rules for Control of Open Burning.

Obligation to Comply

5.16 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

5.15 At least 10 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/edg/air/eqptrel.htm. Each PERF, along with a colored plot plan of the relocation site, shall be mailed to the following address:

PERF Processing Unit
Idaho DEQ - Air Quality
4440 N. Fulton
Boise, ID 83706-4056
3. CEMENT STORAGE SILO

2.4 Process Description

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

2.6 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 PM_{10} from cement silo loading shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

Operating Requirements

3.4 Throughout Limits

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

2.6 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 4.1 EMISSION LIMITS

<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>0.6</td>
</tr>
<tr>
<td>All associated process emissions (fugitives included)</td>
<td></td>
<td>19.4</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 condensables.
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 9-342A 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.