



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR
TONI HARDESTY, DIRECTOR

November 6, 2006

Certified Mail No. 7005 1160 0000 1550 7732

Ron Smith
Plant Manager
Ash Grove Cement Company
230 Cement Road
Inkom, ID 83245

RE: Facility ID No. 005-00004, Ash Grove Cement Company, Inkom
Final PTCs and Amended Tier I Operating Permit Letter

Dear Mr. Smith:

The Department of Environmental Quality (DEQ) is issuing Final PTCs No. P-060304 and P-060322, and amended Tier I Operating Permit No. TI-060305, for the increased throughput of limestone, clay, shale, gypsum, and cement, and an increased coal handling limit, for the Ash Grove Cement Co. (Ash Grove) facility located near Inkom, in accordance with IDAPA 58.01.01.209.05.c and 381, Rules for the Control of Air Pollution in Idaho. The Tier I permit has been administratively amended by DEQ as requested in your February 23, 2006, permit application. The Final PTCs and the Amended Tier I permit are effective immediately. Please be aware these permits replace specific sections of Tier II Operating Permit No. 005-00004, issued on November 27, 2002, as identified in Section 1 of the attached PTCs, and the Tier I Operating Permit No. TI-040308 issued on April 8, 2005, the terms and conditions of which no longer apply. This permit does not release Ash Grove from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Pocatello Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Ken Hanna at (208) 373-0283 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon, Stationary Source Program Manager
Air Quality Division

MS/KH/bf

Permit No.s P-060304, P-060322 and T1-060305

Enclosures

c: Eric Hansen, Geomatrix Consultants, Inc., 19203 36th Avenue W, Suite 101, Lynwood, WA 98036
 Pete Wagner, Pocatello Regional Office
 Bill Rogers, Permit Coordinator
 Ken Hanna, Permit Writer (Ltr Only)
 Marilyn Seymore/ Pat Rayne, Air Quality Division
 Joan Lechtenberg, Public Comment
 Laurie Kral, US EPA Region 10
 Permit Binder
 Source File
 Phyllis Heitman (Ltr Only)
 Reading File (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT NO.: P-060322

FACILITY ID No.: 005-00004

AQCR: 61

CLASS: A

SIC: 3241

ZONE: 12

UTM COORDINATE (km): 397.6 , 4738.6

1. PERMITTEE

Ash Grove Cement Co.

2. PROJECT

Increase Coal Handling Limit

3. MAILING ADDRESS

230 Cement Road

CITY

Inkom

STATE

ID

ZIP

83245-1543

4. FACILITY CONTACT

Ron Smith

TITLE

Plant Manager

TELEPHONE

(208) 775-3351

5. RESPONSIBLE OFFICIAL

Ron Smith

TITLE

Plant Manager

TELEPHONE

(208) 775-3351

6. EXACT PLANT LOCATION

230 Cement Road, Inkom

COUNTY

Bannock

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Portland Cement Production

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not 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 with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

**KEN HANNA, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: November 6, 2006

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Acronyms, Units, And Chemical Nomenclatures

AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
hr	hour(s)
IDAPA	A numbering designation for all administrative rules in Idaho promulgated under the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pound per hour
PM	particulate matter
PM₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
T/yr	tons per year
yr	year(s)

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060322

Permittee:	Ash Grove Cement Co.	Facility ID No. 005-00004
Location:	Inkom, Idaho	

1. PERMIT SCOPE

Purpose

- 1.1 This permit is issued as a modification to the November 27, 2002, Tier II operating permit and permit to construct and is not a renewal. The application for a Tier II renewal is currently being processed as a separate permitting action. This permit is a PTC action to increase the allowable processing rate for coal handling.
- 1.2 This permit incorporates and replaces the following permit conditions in the Tier II Operating Permit No. 055-00004, PM₁₀ SIP Operating Permit, issued November 27, 2002, and these terms and conditions no longer apply:
- Section 14, Condition 4

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section(s)	Source Description	Emissions Control(s)
2	Coal Handling	Partial Enclosure

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2. COAL HANDLING

1. Source Description

1.1 Process Description

Coal handling involves the receiving, handling, processing, and storage of coal.

1.2 Control Description

Emissions associated with the transfer points from the dumping of coal to the coal elevator, including transfers to and from the coal hopper, coal belt, and coal elevator, are uncontrolled. Emissions associated with all transfers points from the coal silo to the No. 2 coal mill, including transfers to and from the No. 1 and No. 2 coal mills, are controlled by being enclosed.

1.3 Equipment Specifications

1.3.1 Coal Mill No. 1

Manufacturer: Raymond
Model: 442

1.3.2 Coal Mill No. 2

Manufacturer: Raymond
Model: 423A

2. Emission Limits

- Fugitive emissions of PM shall be reasonably controlled as required in IDAPA 58.01.01.650 and 651; and
- Fugitive emissions of PM and PM₁₀ shall not exceed the pound per hour (lb/hr) or ton per year (T/yr) values listed in the Appendix of this permit.

3. Monitoring Requirements

The permittee shall record, in tons per hour and tons per year, the amount of coal burned in the kiln systems.

4. Operating Requirements

The coal hopper shall handle no more than 280 tons of coal per hour on an average hourly basis and 84,384 tons of coal per year.

5. Reporting and Recordkeeping Requirements

The permittee shall record, in a daily report, the information requested in Permit Condition 3. These records shall be maintained on file by the permittee for a minimum period of two years and made available to DEQ representatives upon request.

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3. APPENDIX – FUGITIVE EMISSION LIMITS

FUGITIVE EMISSION LIMITS^A – HOURLY^A (lb/hr) AND ANNUAL^B (ton/yr)

Source Description	PM		PM ₁₀	
	lb/hr	ton/yr	lb/hr	ton/yr
Coal Handling	5.61	1.25	1.40	0.47

^AAs determined from DEQ's emission estimation methods used in Ash Grove Cement Tier II operating permit application analysis.

^BAs determined by multiplying the actual or allowable (if actual is not available) pound per hour (lb/hr) emission rate by the allowable hours per year that the process(es) operate, or by actual annual production

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4. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions 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.

[Idaho Code §39-101, et seq.]

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

[IDAPA 58.01.01.211, 5/1/94]

3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;

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- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (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 measurement. 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 and 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 DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

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Facility ID No. 005-00004

Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification 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.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. 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.