IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 334-0502

Philip E. Batt, Governor

July 7, 1995

CERTIFIED MAIL #P 875 704 102

Steve Lafrenz, President
Lake Pre-Mix Concrete
P.O. Box 1356
Sandpoint, Idaho 83864

RE: Issuance of Tier II Operating Permit (#017-00040) for Lake Pre-Mix Concrete RACT/RACM Implementation for the Attainment Date Extension Project

Dear Mr. Lafrenz:

In accordance with the requirements of the Sandpoint PM_{10} SIP and the Attainment Date Extension Project, the Division of Environmental Quality (DEQ) is issuing Tier II Operating Permit #017-00040 for Lake Pre-Mix Concrete's concrete batch plant, located in Sandpoint, Idaho. The enclosed permit reflects the revised PM_{10} emissions inventory and analysis that DEQ and Lake Pre-Mix developed in response to the June through August 1994, public comment period, for Lake Pre-Mix's operations.

Upon review of the permit, you will note that DEQ did not alter the proposed operating permit other than for a few grammatical changes. In your public comment submittal, received June 23, 1995, you requested that DEQ increase the allowable hourly throughput from the existing thirty-four (34) yd^3/hr to seventy (70) yd^3/hr to account for increased hourly capacity due to equipment modernization. This request would require DEQ to analyze and model ambient air quality impacts for an entirely new scenario. At the present time DEQ cannot pursue discussions about this topic due to the severe time constraints for issuing the operating permits to demonstrate to EPA that RACT/RACM have been implemented, and thereby, receive an extension for the deadline for the demonstration of the attainment of the 24-hour PM_{10} standard.

It is apparent from the June 23, 1995, public comment submittal that DEQ and Lake Pre-Mix must discuss both the modernization/Permit to Construct modification and the operational setback requirement of twenty (20) meters upon the facility's relocation. At the present time, DEQ is developing an isopleth map to display the ambient PM_{10} background concentrations that will be used for Lake Pre-Mix's possible relocation. DEQ sincerely desires to work with you in arriving at a feasible solution to Lake Pre-Mix's situation.

DEQ stresses that options exist with the Permit to Construct modification process to address outstanding issues that Lake Pre-Mix may feel have not been addressed in your operating permit. Your public comment submittal included an increased throughput request that would require remodeling of the SIP emissions inventory. As a result, DEQ would be legally required to once again revise the Tier II Operating Permits **and** the newly-revised SIP plan, and submit both for another public comment review. If this were to occur, an extension of the attainment date for the Sandpoint "moderate" PM_{10} nonattainment area would not be granted by EPA, and the area would be redesignated a "serious" PM_{10} nonattainment area. The redesignation will also occur if one or more of the four affected industrial facilities contests the issuance of their Tier II Operating Permit.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Brian R. Monson, Chief, Operating Permits Bureau, at (208) 334-5898.

Sincerely,

Martin Baer for
ODG

Orville D. Green
Assistant Administrator
Permits and Enforcement

ODG\BRM\DAM:jrj...\permit\letters\lakeiss.cov

Enclosure

cc: D. Redline, NIRO
COF
D. Cole, EPA-IOO
Mike McGown, CP
Source File
L. Kronberg, AG

STATE OF IDAHO AIR POLLUTION OPERATING PERMIT GENERAL INFORMATION	PERMIT NUMBER 017 - 00040 AQCR: 063 CLASS: B SIC: 3273 ZONE: 11 UTM COORDINATE (km): 533.9, 5347.2

1. **PERMITTEE**
   Lake Pre-Mix Concrete

2. **PROJECT**
   Concrete Batch Plant/Sandpoint PM_{10} State Implementation Plan
   Tier II Operating Permit (RACT/RACM Implementation)

3. **ADDRESS** P.O. Box 1356	**TELEPHONE #** (208) 263-5000	**COUNTY** Bonner
4. **CITY** Sandpoint	**STATE** Idaho	**ZIP CODE** 83864
5. **PERSON TO CONTACT** Steve Lafrenz	**TITLE** President	

6. **EXACT PLANT LOCATION**
   Present Location: Corner of Short and Fir Street, Sandpoint.
   Map Location: NW 1/4, NE 1/4, Sec. 22, T57N R2W

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
   Concrete Batch Plant

8. **GENERAL CONDITIONS**

   This permit is issued according to the **Rules for the Control of Air Pollution in Idaho**, Section 16.01.01.400 and 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.

   THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF OPERATION AND DESIGN INFORMATION PRESENTED MADE AVAILABLE TO THE DEPARTMENT. CHANGES IN DESIGN, OPERATION, OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MUST BE APPROVED IN ADVANCE BY THE DEPARTMENT.

Martin Bauer for OOB

ASSISTANT ADMINISTRATOR
DIVISION OF ENVIRONMENTAL QUALITY

ISSUED July 7, 1995
DATE

EXPIRES July 7, 2000
DATE

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Lake Pre-Mix Concrete
Concrete Batch Plant
Sandpoint, Idaho

0 1 7 - 0 0 0 4 0

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Cement Silo Vent

1. SOURCE DESCRIPTION

1.1 Process Description

Raw cement is delivered to the facility by bulk delivery truck. The cement is pneumatically transported through a pipe to the cement storage silo. Cement is then delivered from the cement silo to the weigh hopper by an enclosed auger. Sized aggregate is conveyed from ground level to fully enclosed elevated storage bins by bucket elevator. Cement and sized aggregate are apportioned by the enclosed weigh hopper for delivery into mixer trucks. Water and the aggregate/cement combination are introduced to the mixer trucks located below the overhead weigh hopper. The mixer trucks blend the mixture and transport the concrete off-site.

1.2 Control Description

Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM_{10}) emissions from the cement silo are controlled by a minibaghouse. Emissions from the transfer of cement and aggregate to the weigh hopper are controlled by a full enclosure. The enclosure vents to the same minibaghouse as the cement silo.

Fugitive PM_{10} emissions resulting from the transfer of the aggregate/sand and cement mixture from the weigh hopper to the mixer trucks are controlled by a shrouding fogger unit.

1.3 Control Equipment Specifications

1.3.1 Minibaghouse (No brand name/model number obtainable).

1.3.1.1 Baghouse configuration: minibaghouse with four (4) bags; each bag is twelve (12) inches in diameter and forty-four (44) inches long.

1.3.1.2 Performance design characteristics: No manufacturer's data available.

1.3.1.3 Stack parameters: Elevation of silo vent is a minimum of thirty-seven (37) feet high with vent diameter of 0.25 meters.

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SOURCE

Cement Silo Vent

1.3.2 Weigh Hopper Enclosure (No brand name/model number obtainable).

1.3.2.1 Enclosure completely encompasses elevated aggregate storage bins and weigh hopper unit. The enclosure is equipped with a doorway to allow for bucket transfer of aggregate and sand to the elevated storage bins.

The weigh hopper enclosure vents to the cement silo baghouse by natural draft.

1.3.3 Shrouding Fogger Unit (Manufacturer: Torgisson)

1.3.3.1 Performance design characteristics: No manufacturer's data available.

2. EMISSION LIMITS

2.1 Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM_{10}) emissions shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

2.2 Visible emissions shall not exceed 20 percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required by IDAPA 16.01.01.625 and using the Department's "Procedures Manual for Air Pollution Control".

3. OPERATING REQUIREMENTS

3.1 Maximum Throughput

The Permittee shall comply with throughput restrictions listed in the body of this permit and Appendix B.

3.1.1 Weigh Hopper

The maximum allowable weigh hopper material throughput for the transfer of sand, aggregate, and cement shall be sixty-five (65) tons per hour.

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SOURCE

Cement Silo Vent

3.1.2 Mixer Truck Loading

The maximum allowable production rate of wet concrete shall be thirty-four (34) cubic yards per hour (yd^3/hr).

The maximum allowable daily production shall be 270 cubic yards (yd^3/day) of wet concrete. A "day" shall commence at 0000 hours and end at 2400 hours.

3.2 Fogger Unit

3.2.1 Continuous operation of the shrouding fogger unit is required during transfer of cement, sand, and aggregate from the weigh hopper to the mixer trucks.

3.2.2 Maintenance of the shrouding fogger unit shall be performed if observed visible emissions from the mixer truck loading operation exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required by IDAPA 16.01.01.625 and using the Department's "Procedures Manual for Air Pollution Control".

3.3 Relocation of Facility

One (1) relocation of this facility is allowed for by this permit. The new location of the facility shall be approved in advance by the Department. The Permittee shall contact the Department and provide a scaled plot plan of the proposed site (complete with reference UTM coordinates). The facility property shall be at a location with a predicted twenty-four (24) hour average ambient background concentration of 90 $\mu g/m^3$ or less.

The Permittee shall abide by the following requirements:

All process equipment and storage piles shall be located a minimum distance of twenty (20) meters (65 feet) from the nearest property boundary. Haul roads should be located as far away from the property boundary as possible. All provisions and requirements within this permit remain in effect, except the daily allowable throughput restrictions.

Allowable daily throughput shall be 400 cubic yards of wet concrete provided the Permittee submits an approvable ESCDS as required in Section 4.1 on Page 7 of 12 of this permit.

AIR POLLUTION OPERATING PERMIT

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Lake Pre-Mix Concrete
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017 - 00040

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SOURCE

Cement Silo Vent

4. MONITORING REQUIREMENTS

4.1 Throughput Log

The following information shall be recorded weekly and maintained on site for the most recent two (2) year period.

4.1.1 Amount (cubic yards per day) of concrete hauled out of the facility.

4.2 Shrouding Fogger Unit
In the event the visible emissions exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, the Permittee shall describe the maintenance procedures performed on the shrouding fogger unit to correct the problem and keep the documentation in the same location as the throughput log.

5. REPORTING REQUIREMENTS

5.1 Throughput Log

Access to throughput records shall be granted to Department representatives upon request.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

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Lake Pre-Mix Concrete
Concrete Batch Plant
Sandpoint, Idaho

0 1 7 - 0 0 0 4 0

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Fugitive Emission Sources

1. SOURCE DESCRIPTION

1.1 Process Description

This section of the permit includes fugitive emission sources. Sources of fugitive emissions include vehicle traffic on unpaved roads, aggregate handling, and stockpile erosion. Various sized sand and gravel aggregates are delivered by truck to the stockpile area. A front-end loader delivers size-specific aggregate to a common bin. A bucket elevator delivers sized aggregate to two (2) overhead bins at the top of the concrete plant. Metered quantities of aggregate and cement are fed directly from the weigh hopper into concrete mixing trucks. Additional water is added during cement and aggregate loading according to specific mix requirements. The mixer trucks blend the cement/aggregate/water mixture, and the concrete is transported off-site for delivery. Aggregate for custom mixes is fed directly into the concrete mixer trucks from an open conveyor and stockpile at ground level.

2. EMISSION LIMITS

2.1 Fugitive Emissions

At all times, fugitive emissions shall be reasonably controlled by the following methods, but not limited to the following methods, as required in IDAPA 16.01.01.650.

2.1.1 All unpaved haul roads and front-end loader travel areas shall be treated with an environmentally safe chemical dust suppressant (ESCDS) at least once every thirty (30) days during the months of facility operation when the ground is not frozen. In the event that facility operations cease for a period of greater than thirty (30) days, an initial ESCDS application shall precede the commencement of hauling materials into or out of the facility and front end loader activity within the facility. A final ESCDS application shall occur no more than thirty (30) days prior to the cessation of such hauling and/or loading. The ESCDS shall be applied in sufficient quantities so as to provide reasonable control of fugitive dust from the unpaved haul roads and front-end loader travel areas.

2.2 Visible emissions shall not exceed 20 percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required by IDAPA 16.01.01.625 and using the Department's "Procedures Manual for Air Pollution Control".

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

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Lake Pre-Mix Concrete
Concrete Batch Plant
Sandpoint, Idaho

0 1 7 - 0 0 0 4 0

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SOURCE

Fugitive Emission Sources

3. OPERATING REQUIREMENTS

3.1 Speed Limit

All traffic shall be restricted to a maximum speed of five miles per hour (5 mi/hr) while traveling on unpaved roads and areas within the facility.

4. MONITORING REQUIREMENTS

4.1 Chemical Dust Suppressant Application Plan

4.1.1 The Permittee shall develop and keep current a Chemical Dust Suppressant Application Plan (CDSAP). The CDSAP shall include:

4.1.1.1 Brand name and chemical composition of the ESCDS selected for use.

4.1.1.2 Dilution ratio (volume of water: volume of ESCDS) to be used in the formation of each ESCDS solution ready for direct application.

4.1.1.3 Projected dates of ESCDS solution application.

4.1.1.4 Application intensity, in gallons per square yard (gal/yd^2), of the ESCDS solution for each projected treatment date.

4.1.1.5 Facility plot plan illustrating the proposed treatment areas.

4.2 ESCDS Application Log

The Permittee shall record the following information each time the ESCDS is applied (i.e., at least every 30 days or such shorter time as required for the ESCDS).

4.2.1 Brand name and chemical composition of the ESCDS used.

4.2.2 Dilution ratio (volume of water: volume of ESCDS) used to form the ESCDS solution ready for direct application.

4.2.3 Date of ESCDS solution application.

4.2.4 Application intensity (gal/yd^2) of the ESCDS solution.

4.2.5 Facility plot plan illustrating the treated areas.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

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SOURCE

Fugitive Emission Sources

4.2.6 Name of the firm and of the operator responsible for the ESCDS solution application. The operator shall initial these required records to verify their accuracy.

5. REPORTING REQUIREMENTS

5.1 Chemical Dust Suppressant Application Plan

5.1.1 A copy of the CDSAP shall be made available to Department representatives upon request.

5.1.2 The Permittee shall notify the Department in writing of any changes in an existing CDSAP at least thirty (30) days prior to the proposed date of change.

5.2 ESCDS Application Log

5.2.1 A copy of the ESCDS Application Log shall be maintained on site for the most recent two (2) year period.

5.2.2 Access to these records shall be made available to Department representatives upon request.

APPENDIX A

Lake Pre-Mix Concrete

PM-10 Emission Limits[a] - Hourly (lb/hr) and Annual[b] (T/yr)

Source Description Current Site	PM-10 Hourly Emissions Pounds per Hour (lb/hr)	PM-10 Annual Emissions Tons per Year (T/yr)
PRESENT SITE: 1. Cement Silo Vent	0.034	0.02
2. Fugitive Emission Sources	0.22	0.32
RELOCATION: 3. Cement Silo Vent	0.034	0.03
4. Fugitive Emission Sources	0.22	0.48

a As determined by a pollutant specific U.S. EPA reference method, or Department approved alternative, or as determined by the Department's emission estimation methods used in this permit analysis.

b 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.

APPENDIX B

Lake Pre-Mix Concrete

Maximum Throughput Values at Fugitive Emission Sources

Source Description	Material(s) Handled	Maximum Hourly Throughput (T/hr) or (yd^3/hr)	Maximum Daily Throughput (T/day) or (yd^3/day)
1. Weigh Hopper Loading	cement and aggregate	65 T/hr	
2. Cement Truck Loading	cement, aggregate, and water	34 yd^3/hr	270 yd^3/day
3. Cement Truck Loading (Relocation)	cement, aggregate, and water	34 yd^3/hr	400 yd^3/day

where: T/day means tons per hour; and
yd^3/day means cubic yards per day

ISSUED: July 7, 1995
EXPIRES: July 7, 2000

OPERATING PERMIT GENERAL PROVISIONS

A. 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.

B. 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 laws for the control of air pollution.

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

1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and

2) 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 emission testing in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.

D. Except for data determined to be confidential under Section 39-111, **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 Division of Environmental Quality.

E. 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.

F. If emission testing is specified, the Permittee must schedule such testing within sixty (60) days after achieving the maximum production rate, but not later than one hundred and eighty (180) days after initial startup. Such testing must **strictly** adhere to the procedures outlined in the Department's **Procedures Manual for Air Pollution Control**, and will not be conducted on weekends or state holidays. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least fifteen (15) working days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.

The performance tests will be performed at the maximum production rate. If this maximum rate is not achieved during testing, the allowable production rate will be limited to the production rate attained during testing.

G. 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.

H. 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 sixty (60) days after receipt of the Director's request shall cause the permit to be voided.

I. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must 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.

J. The Permittee shall provide the Department a minimum of fifteen (15) working days' notice prior to the scheduled date of any emissions test required pursuant to this permit. The Permittee shall notify the Air Quality Bureau of any change in the testing schedule and shall provide at least one (1) working day's notice prior to conducting any rescheduled test. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

K. 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.

L. Operation information shall include daily and annual hours of operation, and process throughput rate(s) as applied to development of permit conditions.

M. Equipment replacement shall not constitute a modification pursuant to IDAPA 16.01.01.200 of the **Rules for the Control of Air Pollution in Idaho** only if the Permittee operates the replacement equipment in accordance with the requirements of this permit.

N. Any records of performance tests, and any other information collected to ascertain whether limits of this permit are being met shall be kept in an easily accessible location at the permitted facility for at least two (2) years.

The Permittee shall submit a test protocol for each performance test conducted on equipment listed in this permit. The protocol shall be submitted to the Department for approval at least thirty (30) days prior to each test date. Each performance test report, including any required process data, shall be submitted to the Department within thirty (30) days of the date on which the performance test is conducted.

ISSUED: July 7, 1995
EXPIRES: July 7, 2000

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