



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

JAMES E. RISCH, GOVERNOR  
TONI HARDESTY, DIRECTOR

August 4, 2006

**Certified Mail No. 7005 1160 0000 1550 4922**

Ed Hattrup  
Owner  
Clearwater Concrete, Inc.  
P.O. Box 2270  
McCall, ID 83638

RE: Facility ID No. 777-00379, Clearwater Concrete, Inc., Portable  
Final Permit to Construct

Dear Mr. Hattrup:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-060010 to Clearwater Concrete, Inc. for a portable concrete batch plant to be initially located in McCall. This permit is issued in accordance with IDAPA 58.01.01.200 through 228, Rules for the Control of Air Pollution in Idaho, and is effective immediately.

This permit does not release Clearwater Concrete from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of DEQ's Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. In addition to your facility's plant manager, DEQ recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the 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 Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/HE/bf

Permit No. P-060010

Enclosures

**c: Leonard Herr, Boise Regional Office  
Harbi Elshafei, AQ Analyst 3  
Bill Rogers, Permit Coordinator  
Marilyn Seymore/ Pat Rayne, Air Quality Division  
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-060010**

**FACILITY ID No.: 777-00379**

**CLASS: SM**

**SIC: 3273**

**UTM COORDINATE (km): Portable**

**1. PERMITTEE**

Clearwater Concrete, Inc.

**2. PROJECT**

Initial Permit to Construct – Portable Concrete Batch Plant

**3. MAILING ADDRESS**

PO Box 2270

**CITY**

McCall

**STATE**

ID

**ZIP**

83638

**4. FACILITY CONTACT**

Ed Hatstrup

**TITLE**

Owner/Operator

**TELEPHONE**

(208) 634-5101 or 271-6067 (cell)

**5. RESPONSIBLE OFFICIAL**

Ed Hatstrup

**TITLE**

Owner/Operator

**TELEPHONE**

(208) 634-5101 or 271-6067 (cell)

**6. EXACT PLANT LOCATION**

Portable

**COUNTY**

Portable

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Concrete batch plant

**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.

*Toni Hardesty*

**TONI HARDESTY, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED: August 4, 2006**

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## **Acronyms, Units, and Chemical Nomenclature**

<b>acfm</b>	<b>actual cubic feet per minute</b>
<b>AQCR</b>	<b>Air Quality Control Region</b>
<b>cy/hr</b>	<b>cubic yard per hour</b>
<b>DEQ</b>	<b>Department of Environmental Quality</b>
<b>IDAPA</b>	<b>a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act</b>
<b>km</b>	<b>kilometer</b>
<b>O&amp;M</b>	<b>operations and maintenance</b>
<b>PM</b>	<b>particulate matter</b>
<b>PM<sub>10</sub></b>	<b>particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers</b>
<b>PERF</b>	<b>Portable Equipment Registration and Relocation Form</b>
<b>PTC</b>	<b>permit to construct</b>
<b>SIC</b>	<b>Standard Industrial Classification</b>
<b>T/yr</b>	<b>tons per year</b>
<b>SM</b>	<b>synthetic minor</b>
<b>UTM</b>	<b>Universal Transverse Mercator</b>

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060010**

<b>Permittee:</b>	Clearwater Concrete Inc.	<b>Facility ID No.</b> 777-00379	<b>Date Issued:</b>	August 4, 2006
<b>Location:</b>	Portable			

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

- 1.1 This Permit to Construct (PTC) allows for the construction of a portable concrete batch plant. This PTC is the facility's initial permit.

***Regulated Sources***

Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	<p><u>Concrete Batch Plant</u> The plant consists of cement storage silo and weigh batcher</p> <p>Manufacturer: Erie Strayer Model: MG-11T Maximum throughput rate: 200 cubic yard per hour (cy/hr)</p>	<p><u>Cement Storage Silo Dust Collector:</u> Manufacturer: C&amp;W Model: CP-LPR-8-S, cartridge pulse silo collector PM<sub>10</sub> Control Efficiency: 99.9%</p> <p><u>Weigh Batcher Dust Collector:</u> Manufacturer: C&amp;W Model: CP-35-219, pulse jet collector PM<sub>10</sub> control efficiency: 99.99%</p>

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**2. CONCRETE BATCH PLANT**

**2.1 Process Description**

The facility is portable truck mix concrete batch plant manufactured by Erie Strayer. The concrete batch plant consists of an aggregate storage bin, cement storage silo, weigh batcher, and conveyors, all supplied as one portable unit. The plant combines sand, gravel, cement, and water to produce concrete. Aggregate, sand, and coarse material are transferred by conveyor from bins to a truck mix for mixing onsite. Cement is measured and mixed in a batcher. From the batcher, the cement mixture is added to the aggregate at the truck loading location.

The cement silo, the weigh batcher, and the truck mix loading are equipped with dust collectors. The silo dust collector is located at the top of the silo to capture particulate matter emitted during cement loading process. Electric power is supplied to the concrete batch plant from the local power grid.

**2.2 Emissions Control Description**

**Table 2.1 CEMENT STORAGE SILO DESCRIPTION**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
Cement storage silo	Dust collector	<u>Silo stack parameters:</u> Stack height: 75 ft Stack diameter: 3.8 ft Exit air flow: 2,340 acfm
Weigh batcher and truck mix loading	Dust collector	<u>Weigh Batcher stack parameters:</u> Stack height: 25 ft Stack diameter: 1.6 ft Exit air flow: 140 acfm

***Emissions Limits***

**2.3 Emissions Limits**

- The combined particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometer (PM<sub>10</sub>) emissions from the cement storage silo, weigh batcher dust collector, and truck mix loading stacks shall not exceed 5.82 pounds per day.
- Arsenic emissions from the cement storage silo and the weigh batcher dust collector stacks shall not exceed 0.018 pounds per any consecutive 12-month period.

**2.4 Visible Emissions Limit**

Emissions from the cement storage silo dust collector stack, the weigh batcher dust collector stack, or any other stack, vent, or functionally equivalent opening associated with the portable concrete batch plant, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

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***Operating Requirements***

**2.5 Concrete Production Rate Limit**

- The concrete production rate shall not exceed 700 cubic yards per day.
- The maximum production rate of concrete shall not exceed 50,000 cubic yard per any consecutive 12-month period.

**2.6 Operations and Maintenance Manual Requirements**

Within 60 days of permit issuance, the permittee shall have developed an O&M manual for the dust collectors, which controls the PM and PM<sub>10</sub> emissions from the plant (i.e., cement silo and weigh batcher, truck mix loading). The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the dust collectors. The manual shall contain, at a minimum, requirements for monthly inspections of the dust collectors during each month of operation. The inspections shall include, but not be limited to, checking the cartridges for structural integrity, that they are appropriately secured in place, and they are not plugged. The permittee shall operate the dust collectors in accordance with the O&M manual. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

**2.7 Fugitive Dust Control Strategies**

The permittee shall immediately implement a strategy or strategies to control fugitive dust emissions whenever:

- 2.7.1 Visible fugitive emissions are greater than 20% from any transfer point. For the purposes of this permit condition, transfer points include, but are not limited to, the following: transfer of sand and aggregate to respective weight bins/hoppers or storage bins/hoppers; transfer of sand and aggregate from respective weight bins/hoppers or storage bins/hoppers to a conveyor; transfer of sand and aggregate from a conveyor to the mix truck; transfer of cement from its storage silo to the mix truck.

Transfer point control strategies include, but are not limited to, the following: limit drop heights such that there is a homogeneous flow of material; install, operate, and maintain water spray bars to control fugitive dust emissions at transfer points on conveyors.

- 2.7.2 Visible fugitive emissions from wind erosion on stockpiles exceed 20% opacity for a period or periods aggregating more than one minute in any 60-minute period.

Stockpile wind erosion control strategies include, but are not limited to, the following: limit the height of the stockpiles; limit the disturbance of stockpiles; apply water or a chemical dust suppressant onto the surface of the stockpile.

- 2.7.3 Visible fugitive emissions from vehicle traffic on any paved or unpaved roads within the facility boundary of the concrete batch plant exceeds 20% opacity for a period or periods aggregating more than one minute in any 60-minute period.

Visible fugitive emissions control strategies for vehicle traffic on paved and unpaved roads within the facility boundary include, but are not limited to, the following: limit vehicle traffic; limit vehicle speed; apply water or a chemical dust suppressant to the surface of the road; apply gravel to the surface of unpaved roads; and sweep or use water sprays to clean the surface of a paved road.



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**2.8 Reasonable Control of Fugitive Emissions**

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. 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, 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 filters 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 stored material from streets, where practical.

**Monitoring and Recordkeeping Requirements**

**2.9 Concrete Production Rate Monitoring**

The permittee shall monitor and record the daily (when the facility is operated that day), monthly, and annually, concrete production to demonstrate compliance with Permit Condition 2.5. Annual production shall be determined by summing each monthly production rate over the previous consecutive 12-month period. These records shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

**2.10 Visible Emissions Monitoring**

The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions including the dust collector stacks, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation of for each potential source of visible emissions. If any visible emissions are present from any point of emissions, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 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 accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each 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 and 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

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was taken. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

**2.11 Reasonable Control Measures Monitoring**

The permittee shall conduct a monthly 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 fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a 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.

Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

***PM<sub>10</sub> Nonattainment Area***

**2.12 PM<sub>10</sub> Nonattainment Area Operations**

The portable concrete batch plant shall not operate in any PM<sub>10</sub> nonattainment areas under this permit. The permittee may contact DEQ for more specific details about PM<sub>10</sub> nonattainment area boundaries.

Should the permittee desire to operate at PM<sub>10</sub> nonattainment areas, the permittee shall submit a PTC application to modify this permit.

**2.13 Relocation**

All existing portable equipment shall be registered. At least 10 days prior to relocation of any equipment covered by this permit, the permittee shall submit a scaled plot plan and a complete Portable Equipment Registration and Relocation Form (available on DEQ website at:

[http://www.deq.idaho.gov/air/permits\\_forms/forms/ptc\\_relocation.pdf](http://www.deq.idaho.gov/air/permits_forms/forms/ptc_relocation.pdf)), in accordance with IDAPA 58.01.01.500, to the following address:

PERF Processing Unit  
DEQ - Air Quality  
1410 N. Hilton  
Boise, ID 83706-1255

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**3. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

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.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the 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.
  - 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 require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. 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. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
  - A notification of the date of initiation of construction, within five working days after occurrence;
  - A notification of the date of completion/cessation of construction, within five working days after occurrence;
  - 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;
  - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
  - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.
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

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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.

7. 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.
8. In accordance with IDAPA 58.01.01.123, 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.