



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor  
Toni Hardesty, Director

May 1, 2008

**Certified Mail No. 7190 0596 0014 0000 2659**

Bryon Morgan  
Project Manager/Health & Safety Officer  
Zanetti Bros., Inc.  
301 E. Mullan Avenue  
Osburn, Idaho 83849

RE: Facility ID No. 079-00004, Zanetti Bros. Inc., Osburn  
Final Permit Letter

Dear Mr. Morgan:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2008.0004 to Zanetti Bros. for the Zanetti Plant Yard concrete batch plant and crushing operation located in Osburn, Idaho in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on January 9, 2008. This permit is effective immediately and replaces Facility Permit No. 13-1420-0004-00, issued on July 18, 1979, the terms and conditions of which no longer apply. This permit does not release Zanetti Bros. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Coeur d'Alene Regional Office, 2110 Ironwood Parkway, Coeur d'Alene, Idaho 83814, Fax (208) 769-1404.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Ralph Paul, AQ Compliance Officer, at (208) 769-4609 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Zanetti Bros. Inc., Osburn  
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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 contact Morrie Lewis at (208) 373-0502 or [Morrie.Lewis@deq.idaho.gov](mailto:Morrie.Lewis@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon", written in a cursive style.

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\ML\hp

Project No. P-2008.0004

Enclosures

Zanetti Bros. Inc., Osburn  
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HARD COPY TO FACILITY

en: Mark Boyle, Coeur d'Alene Regional Office  
Ralph Paul, Coeur d'Alene Regional Office  
Scott Honodel, Coeur d'Alene Regional Office  
Vonnie Hendrex, Coeur d'Alene Regional Office  
Morrie Lewis, Permit Writer  
Marilyn Seymore/ Pat Rayne, AQ Division  
Stationary Source Administrative Assistant

en-web: Laurie Kral, U.S. EPA Region 10

cc: Bryon Morgan, Zanetti Bros., Bryon@sv2day.com  
Nichol Pettis, LFR Inc., Nichol.Pettis@lfr.com  
Kevin Freeman, LFR Inc., Kevin.Freeman@lfr.com

c: Reading File (Ltr Only)  
Source File  
Permit Binder  
Bill Rogers, Permit Coordinator (Ltr Only)  
Phyllis Heitman, AQ Division (Ltr Only)



**Air Quality  
PERMIT TO CONSTRUCT  
State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** P-2008.0004  
**FACILITY ID No.:** 079-00004  
**AQCR:** 62                      **CLASS:** B  
**SIC:** 3273/1442              **ZONE:** 11  
**UTM COORDINATE (km):** 576.0, 5261.7

**1. PERMITTEE**

Zanetti Bros., Inc.

**2. PROJECT**

Permit to construct for replacement concrete batch plant with rock crushing and sand screening operations

**3. MAILING ADDRESS**

301 E. Mullan Avenue

**CITY**

Osburn

**STATE**

Idaho

**ZIP**

83849

**4. FACILITY CONTACT**

Bryon Morgan

**TITLE**

Project Manager/  
Health & Safety Officer

**TELEPHONE**

(208) 752-1178  
Bryon@sv2day.com

**5. RESPONSIBLE OFFICIAL**

Herb Zanetti

**TITLE**

Owner

**TELEPHONE**

--see above--

**6. EXACT PLANT LOCATION**

10<sup>th</sup> Street and Mullan Avenue, Osburn, ID 83849

**COUNTY**

Shoshone

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

Contractor services, excavation, rock products, concrete production

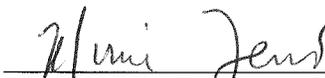
**8. PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, 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 in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

  
 MORRIE LEWIS, PERMIT WRITER  
 DEPARTMENT OF ENVIRONMENTAL QUALITY

  
 MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
 DEPARTMENT OF ENVIRONMENTAL QUALITY

<b>DATE MODIFIED/REVISED:</b>	May 1, 2008
<b>DATE ISSUED:</b>	July 18, 1979

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## Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
BMP	Best Management Practices
CFR	Code of Federal Regulations
CO	carbon monoxide
cy	cubic yards
cy/day	cubic yards of concrete per calendar day
cy/hr	cubic yards of concrete per hour
cy/yr	cubic yards of concrete per consecutive 12-calendar month period
DEQ	Department of Environmental Quality
ft	feet
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meters
O&M	operations and maintenance
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0004**

**Permittee:** Zanetti Bros., Inc.

**Location:** Osburn, Idaho

**Facility ID No. 079-00004**

**1. PERMIT TO CONSTRUCT SCOPE**

**Purpose**

- 1.1** This permit to construct (PTC) is for a replacement concrete batch plant and an existing rock crushing and sand screening facility. An existing concrete batch plant will be dismantled prior to operation of the new concrete batch plant.
- 1.2** This PTC replaces the following permit, the terms and conditions of which shall no longer apply:
- Facility Permit No. 13-1420-0004-00, issued July 18, 1979.

**Regulated Sources**

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

**Table 1.1 SUMMARY OF REGULATED SOURCES**

Permit Section	Source Description	Emissions Controls
2, 3	<u>Concrete batch plant – ready mix</u> Manufacturer: CON-E-CO Model: Premier Low-Profile 12S Serial Number: C-8261L Maximum capacity: 150 cy/hr Maximum production: 400 cy/day and 45,000 cy/yr	<u>Cement Storage Silo No. 1 Baghouse/Cartridge Filter</u> Manufacturer: CON-E-CO Model: PJC-300S
		<u>Cement Storage Silo No. 2 Baghouse/Cartridge Filter</u> Manufacturer: CON-E-CO Model: PJC-300S
		<u>Weigh Batcher Vent Baghouse/Cartridge Filter</u> Manufacturer: CON-E-CO Model: BV14-23
		<u>Truck Loadout Mixer Shroud Baghouse/Cartridge Filter</u> Manufacturer: CON-E-CO Model: PJ-980
		<u>Material Transfer Point Water Sprays or Equivalent</u>
2, 4	<u>Crushing and screening operations</u> “Grizzly” crusher Manufacturer: unknown Model: unknown Maximum capacity: 105 cy/hr Maximum production: 1,893 cy/day and 15,147 cy/yr Construction Date: before 1979	<u>Best Management Practices (BMP), water sprays, or equivalent control methods</u>
	Cone crusher Manufacturer: unknown Model: unknown Maximum capacity: 105 cy/hr Maximum production: 1,893 cy/day and 15,147 cy/yr Construction Date: before 1979	

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0004**

**Permittee:** Zanetti Bros., Inc.

**Location:** Osburn, Idaho

**Facility ID No. 079-00004**

## **2. FACILITY-WIDE CONDITIONS**

### ***Visible Emissions***

#### **2.1 Visible Emissions/Opacity Limit**

Emissions from any baghouse/cartridge filter stack or from any stack, vent, or other functionally equivalent opening 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 using the test methods and procedures in IDAPA 58.01.01.625.

#### **2.2 Visible Emissions/Opacity Monitoring**

Each month that the facility is operated, the permittee shall conduct a facility-wide inspection of potential sources of visible emissions, including all baghouse/cartridge filter stacks, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see 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 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 was taken.

### ***Fugitive Emissions***

#### **2.3 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, consideration 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 particulate matter. 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 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.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0004**

**Permittee:** Zanetti Bros., Inc.

**Location:** Osburn, Idaho

**Facility ID No. 079-00004**

**2.4 Fugitive Dust Control Strategies**

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

- Visible fugitive emissions are observed leaving the facility boundary. For the purposes of this permit condition, visible emissions shall be determined on a see/no see basis, and the facility boundary shall be defined by the facility property boundary.
- 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 mixer; and transfer of cement and cement supplement from the storage silo to the mixer.

Transfer point control strategies for this concrete batch plant shall include manual water spray capability or installing, operating, and maintaining water spray bars at transfer points, and may also include limiting drop heights as such that there is a homogeneous flow of material.

- 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; and apply water or a chemical dust suppressant onto the surface of the stockpile.
- Visible fugitive emissions from vehicle traffic on any paved or unpaved roads within the facility boundary of the concrete batch plant exceed 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.

**2.5 Fugitive Dust Monitoring**

Each day that the facility is operated, the permittee shall conduct a 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.

Each time fugitive dust emissions trigger correction of a dust control strategy or implementation of additional dust control strategies in accordance with Permit Condition 2.4, and each time a fugitive dust BMP trigger is activated in accordance with Permit Condition 4.5, the permittee shall monitor and record the trigger, the control strategy or corrective action used, and the results achieved from the use of that control strategy or strategies.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0004**

**Permittee:** Zanetti Bros., Inc.

**Location:** Osburn, Idaho

**Facility ID No. 079-00004**

***Collocation***

**2.6 Collocated Operations**

The facility (including the concrete batch plant and the crushing and screening operations) may not collocate with any other source of emissions, including a portable concrete batch plant, rock crushing and sand screening operation, hot-mix asphalt plant, or electrical generator set.

This facility shall be considered to be collocated if the nearest distance between any emissions point associated with another source of emissions, and any stockpile, silo, weigh batcher, transfer point, conveyor, or other emission point associated with this facility is less than 200 meters (656 feet).

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0004**

**Permittee:** Zanetti Bros., Inc.  
**Location:** Osburn, Idaho

**Facility ID No. 079-00004**

**3. CONCRETE BATCH PLANT**

**3.1 Process Description**

The facility is a stationary truck mix concrete batch plant consisting of aggregate storage bins and stockpiles, a cement storage silo, a cement supplement (flyash) storage silo, a weigh batcher, and conveyors. The facility combines sand, gravel, flyash, and cement and transfers the mixture into a truck along with a measured amount of water for in-transit mixing of the concrete. Electric power will be supplied to the facility from the local power grid.

**3.2 Emissions Control Description**

The particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to ten microns (PM<sub>10</sub>) emissions from the cement and cement supplement storage silos, the weigh batcher, and the truck loadout are each controlled by a baghouse/cartridge filter. Table 3.1 below describes the control devices or measures associated with the concrete batch plant.

**Table 3.1 CONTROL DESCRIPTION OF THE CONCRETE BATCH PLANT**

<b>Emissions Units / Processes</b>	<b>Emissions Control Device</b>	<b>Emissions Sources</b>
Cement Storage Silo No. 1	Baghouse/cartridge filter	<u>Cement Storage Silo No. 1 Baghouse/Cartridge Filter</u> Exit height: 50 ft Exit diameter: (2) 11/16" x 48" slots (2) 5/8" x 30" slots Exit air flow rate: 1,500 acfm (max.) Control efficiency: 99.9%
Cement Storage Silo No. 2	Baghouse/cartridge filter	<u>Cement Storage Silo No. 2 Baghouse/Cartridge Filter</u> Exit height: 36 ft Exit diameter: (2) 11/16" x 48" slots (2) 5/8" x 30" slots Exit air flow rate: 1,500 acfm Control efficiency: 99.9%
Weigh batcher	Baghouse/cartridge filter	<u>Weigh Batcher Vent Baghouse/Cartridge Filter</u> Exit height: 25 ft Exit diameter: (2) 2" x 12" Exit air flow rate: 180 acfm Control efficiency: 99.9%
Truck loading	Mixer/shroud, boot, enclosure, or equivalent	<u>Truck Loadout Mixer Shroud Baghouse/Cartridge Filter</u> Exit height: 25 ft Exit diameter: 15 3/4" x 21" Exit air flow rate: 5,880 acfm Control efficiency: 99.9%
Materials Transfer (Fugitives)	Water sprays or equivalent control methods	Aggregate dump to ground, Sand dump to ground, Aggregate dump to conveyor, Sand dump to conveyor, Aggregate conveyor to elevator storage, and Sand conveyor to elevated storage. Estimated Control Efficiency: 75%

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0004**

<b>Permittee:</b>	Zanetti Bros., Inc.
<b>Location:</b>	Osburn, Idaho

**Facility ID No. 079-00004**

***Operating Requirements***

**3.3 Concrete Production Limits**

The concrete batch plant production rate shall not exceed 400 cubic yards per calendar day (cy/day), and shall not exceed 45,000 cubic yards in any consecutive 12-calendar month period (cy/yr).

**3.4 Operations & Maintenance Manual**

Within 60 days of permit issuance, the permittee shall have developed and submitted to DEQ an Operations and Maintenance (O&M) manual for the baghouses/cartridge filters, transfer point boots/enclosures, and the transfer point water sprays (or equivalent control methods). The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouses/cartridge filters. The manual shall contain, at a minimum, requirements for monthly inspections of the baghouses/cartridge filters during each month of operation. The inspections shall include, but not be limited to, checking that the bags have structural integrity, are appropriately secured in place, and are not plugged. The manual shall contain procedures for inspecting and maintaining transfer point boots/enclosures and for operating water sprays (or equivalent control method) to ensure that fugitive dust emissions from transfer points are reasonably controlled. The manual shall remain at the concrete batch plant at all times and shall be made available to DEQ representatives upon request.

The O&M manual shall be submitted to DEQ within 60 days of permit issuance for review and comment at the following address. Any changes to the O&M manual shall be submitted within 30 days of the change.

Air Quality Permit Compliance  
Department of Environmental Quality  
Coeur d'Alene Regional Office  
2110 Ironwood Parkway  
Coeur d'Alene, ID 83814  
  
Phone: (208) 769-1422  
Fax: (208) 769-1404

The operation and monitoring requirements specified in the O&M manual are incorporated by reference to this permit and are enforceable permit conditions.

The permittee shall operate the baghouses/cartridge filters and the water sprays (or equivalent control method) in accordance with the O&M manual.

***Monitoring and Recordkeeping Requirements***

**3.5 Concrete Production Monitoring**

The permittee shall monitor and record the daily (when the facility is operated that day), monthly (when the facility is operated that month), and annual concrete production to demonstrate compliance with Permit Condition 3.3. Annual production shall be determined by summing each monthly production total over the previous consecutive 12-calendar month period.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0004**

<b>Permittee:</b>	Zanetti Bros., Inc.	<b>Facility ID No. 079-00004</b>
<b>Location:</b>	Osburn, Idaho	

**4. CRUSHING AND SCREENING OPERATIONS**

**4.1 Process Description**

The facility crushes pit rock and aggregate to reduce material in size to desired specifications and for processing in the concrete batch plant. Electric power will be supplied to the facility from the local power grid.

**4.2 Emissions Control Description**

Table 4.1 below describes the control devices or measures associated with the crushing and screening operations.

**Table 4.1 CONTROL DESCRIPTION OF THE CONCRETE BATCH PLANT**

<b>Emissions Units / Processes</b>	<b>Emissions Control Device</b>	<b>Emissions Sources</b>
Primary crushing	BMP	“Grizzly” crusher Estimated Control Efficiency: 75%
Secondary crushing	BMP	Cone crusher Estimated Control Efficiency: 75%
Materials Transfer (Fugitives)	BMP, water sprays, or equivalent control methods	Screens (7), Conveyors (15), Aggregate dump to ground, Sand dump to ground, Aggregate dump to conveyor, Sand dump to conveyor, Aggregate conveyor to elevator storage, and Sand conveyor to elevated storage, Road traffic and windblown dust. Estimated Control Efficiency: 75%

***Emissions Limits***

**4.3 Emissions Standards for Fugitive Emissions**

No owner or operator shall cause to be discharged into the atmosphere emissions which exhibit greater than twenty percent (20%) opacity from any crusher, grinding mill, screening operation, bucket elevator, belt conveyor, conveying system, transfer point, vent, capture system, storage bin, stockpile, truck dumping operation, vehicle traffic on an affected paved public roadway, vehicle traffic on or wind erosion of an unpaved haul road, or other source of fugitive emissions in accordance with IDAPA 58.01.01.793. Opacity shall be determined using the test methods and procedures in IDAPA 58.01.01.625.

***Operating Requirements***

**4.4 Crusher Throughput Limits**

The throughput of the primary crusher shall not exceed 1,893 cubic yards per calendar day (cy/day), and shall not exceed 15,147 cubic yards per any consecutive 12-calendar month period (cy/yr).

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0004**

**Permittee:** Zanetti Bros., Inc.

**Location:** Osburn, Idaho

**Facility ID No. 079-00004**

**4.5 Nonmetallic Minerals Processing Plant Fugitive Dust Best Management Practice**

The permittee shall use Best Management Practices (BMP), as defined by IDAPA 58.01.01.011.01, to control the emissions of fugitive dust.

**4.5.1 Crushers and grinding mills BMP**

Triggers that require initiation of a strategy or strategies to control fugitive dust emissions from any crusher, grinding mill, building vent, capture system stack include, but are not limited to, the following:

- Opacity greater than 20% from any crusher or grinding mill at which a capture system is not used.
- For any crusher or grinding mill located within a building, opacity greater than 20% from any building vent.
- Opacity greater than 20% from any capture stack.
- Citizen complaints of failure to reasonably control fugitive dust shall be expeditiously evaluated by the permittee for merit. If the permittee determines the complaint has merit, the progressive strategy shall be expeditiously employed to reasonably control fugitive dust. DEQ may review records and investigate citizen complaints as appropriate. If DEQ finds that a complaint has merit, it may determine additional control measures are required.

Strategies. The following are control strategies for any crusher, grinding mill, building vent, or capture system stack. Controls shall be applied on frequency such that visible fugitive emissions do not exceed any applicable opacity limit.

- Limit drop heights of materials such that there is a homogeneous flow of material.
- Install, operate, and maintain water supply bars to control fugitive dust emissions at crusher drop points as necessary.
- Other control strategy or strategies as approved by DEQ.

**4.5.2 Transfer points, screening operations, and stacks and vents BMP**

Triggers that require initiation of a strategy or strategies to control fugitive dust emissions from transfer points, belt conveyors, bucket elevators, screening operations, conveying systems, capture systems, and building vents include, but are not limited to, the following:

- Opacity greater than 20% from any transfer point on a belt conveyor, conveying system, bucket elevator, or screening operation.
- For any transfer point on a belt conveyor, conveyor system, bucket elevator, or screening operation located within a building, opacity greater than 20% from any building vent.
- Opacity greater than 20% from any capture system stack.
- Citizen complaints of failure to reasonably control fugitive dust shall be expeditiously evaluated by the permittee for merit. If the permittee determines the complaint has merit, the progressive strategy shall be expeditiously employed to reasonably control fugitive dust. DEQ may review records and investigate citizen complaints as appropriate. If DEQ finds that a complaint has merit, it may determine additional control measures are required.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0004**

**Permittee:** Zanetti Bros., Inc.

**Location:** Osburn, Idaho

**Facility ID No. 079-00004**

Strategies. The following are control strategies for transfer points, belt conveyors, bucket elevators, screening operations, conveying systems, capture systems, and building vents. Controls shall be applied on a frequency such that visible emissions do not exceed any applicable opacity limit.

- Limit drop heights of materials 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 belt conveyors, conveying systems, bucket elevators, and screening operations as necessary.
- Other control strategy or strategies as approved by DEQ.

**4.5.3 Vehicle Track-out BMP**

Triggers that require initiation of a strategy or strategies to control fugitive dust emissions from track-out include, but are not limited to:

- Visible deposition of mud, dirt, or similar debris on the surface of a paved public roadway.
- Visible fugitive emissions from vehicle traffic on an affected paved public roadway that approach 20% opacity for a period or periods aggregating more than one minute in any sixty minute period.
- Citizen complaints of failure to reasonably control fugitive dust shall be expeditiously evaluated by the permittee for merit. If the permittee determines the complaint has merit, the progressive strategy shall be expeditiously employed to reasonably control fugitive dust. DEQ may review records and investigate citizen complaints as appropriate. If DEQ finds that a complaint has merit, it may determine additional control measures are required.

Strategies. The following are control strategies for track-out:

- Prompt removal of mud, dirt, or similar debris from the affected surface of the paved public roadway.
- Water flush, and/or water flush and vacuum sweep, the affected surface of the paved public roadway. Runoff shall be controlled so it does not saturate the surface of the adjacent unpaved haul road such that track-out is enhanced. If runoff is not or cannot be controlled, gravel shall be applied to the surface of the adjacent unpaved haul road over an area sufficient to control track-out.
- Apply gravel to the surface of the adjacent unpaved haul road. The area of application shall be sufficient to control track-out.
- Apply an environmentally safe chemical soil stabilizer or chemical dust suppressant to the surface of the adjacent unpaved haul road. The area of application shall be sufficient to control track-out.
- Other control strategy or strategies as approved by DEQ.

**4.5.4 Unpaved Haul Roads BMP**

Triggers that require initiation of a strategy or strategies to control fugitive dust emissions from unpaved haul roads include, but are not limited to:

- Visible fugitive emissions from vehicle traffic on an affected paved public roadway that approach 20% opacity for a period or periods aggregating more than one minute in any 60 minute period.
- Citizen complaints of failure to reasonably control fugitive dust shall be expeditiously evaluated by the permittee for merit. If the permittee determines the complaint has merit, the progressive strategy shall be expeditiously employed to reasonably control fugitive dust. DEQ may review records and investigate citizen complaints as appropriate. If DEQ finds that a complaint has merit, it may determine additional control measures are required.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0004**

<b>Permittee:</b>	Zanetti Bros., Inc.	<b>Facility ID No. 079-00004</b>
<b>Location:</b>	Osburn, Idaho	

Strategies. The following are control strategies for fugitive dust emissions from unpaved haul roads.

- Limit vehicle traffic on unpaved haul roads.
- Limit vehicle speeds on unpaved haul roads. If a speed limit is imposed, signs shall be posted along the haul road route and clearly indicate the speed limit. Signs shall be placed so they are visible to vehicles entering and leaving the site of operations.
- Apply water to the surface of the unpaved haul road. Runoff shall be controlled so it does not saturate the surface of the unpaved haul road such that it causes track-out. If runoff is not or cannot be controlled, gravel shall be applied to the surface of the unpaved haul road over an area sufficient to control track-out.
- Apply gravel to the surface of the unpaved haul road.
- Apply an environmentally safe chemical soil stabilizer or chemical dust suppressant to the surface of the unpaved haul road.
- Other control strategy or strategies as approved by DEQ.

#### **4.5.5 Stockpiles BMP**

Triggers that require immediate initiation of a strategy or strategies to control fugitive dust emissions from stockpiles include, but not limited to:

- Visible fugitive emission from wind erosion of any stockpile that approaches 20% opacity for a period or periods aggregating more than one minute in any 60 minute period.
- Citizen complaints of failure to reasonably control fugitive dust shall be expeditiously evaluated by the permittee for merit. If the permittee determines the complaint has merit, the progressive strategy shall be expeditiously employed to reasonably control fugitive dust. DEQ may review records and investigate citizen complaints as appropriate. If DEQ finds that a complaint has merit, it may determine additional control measures are required.

Strategies. The following are control strategies for stockpiles.

- Limit the height of the stockpiles.
- Limit the disturbance of the stockpiles.
- Apply water onto the surface of the stockpile.
- Other control strategy or strategies as approved by DEQ.

### ***Monitoring and Recordkeeping Requirements***

#### **4.6 Crusher Throughput Monitoring**

The permittee shall monitor and record the daily (when the facility is operated that day), monthly (when the facility is operated that month), and annual throughput from the primary crusher to demonstrate compliance with Permit Condition 4.4. Annual production shall be determined by summing each monthly production total over the previous consecutive 12-calendar month period.

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## **5. 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;
  - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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- 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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***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.  
[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]