



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Tier II Operating Permit No. T2-2008.0156

Challis Redi-Mix

Challis, Idaho

Facility ID No. 037-00008

December 17, 2008

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The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
Tier II	Tier II operating permit

STATEMENT OF BASIS

Permittee:	Challis Redi-Mix	Permit No.	T2-2008.0156
Location:	Challis, Idaho	Facility ID No.	037-00008

1. FACILITY INFORMATION

1.1 Facility Description

Challis Redi-Mix purchased a concrete batch plant and a sand and gravel pit in 1989. The facility is located and has been operating in the same location just outside of Challis, Idaho, since 1978. The facility rarely approaches design capacity and has no full-time employees.

The sand and gravel pit is about one quarter mile from the concrete batch plant. There is a two-deck washing operation with a 125-kilowatt generator permanently located at the pit. Also in the pit is a portable screen powered by a 10 horsepower generator that is sometimes leased and relocated. For about one week each year, a crusher (under separate ownership) is brought to the gravel pit to crush enough gravel for the rest of the year. About 90 percent of the gravel produced in the pit is used in the concrete batch plant. The rest is sold directly to the public.

The concrete batch plant has a maximum capacity of 50 cubic yards of concrete per hour. It is powered by the local utility. There are no elevated storage bins for sand and gravel. For each batch of concrete, the sand and gravel weigh bins are loaded with a front-end loader. A fabric sock was installed to control emissions from the cement storage silo.

The production process begins when sand and gravel are fed into the aggregate weigh hopper by a front-end loader. When a pre-determined amount of each is weighed, the sand and gravel are drop-fed onto an inclined conveyor that transfers the mixture into a cement truck. A pre-determined amount of cement is also weighed and drop-fed through a rubber chute into the cement truck. The rubber chute directs the cement and provides a measure of dust control. Water is then added, and the components are mixed in the truck on the way to the job site.

1.2 Permitting Action and Facility Permitting History

This permitting action is for a Tier II revision for the ownership change to the facility. The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

February 14, 2008

T2-2007.0225, Tier II renewal, Permit status (A)

October 17, 2001

T2-010544, facility-wide Tier II issued to the stationary plant installed without first obtaining a Permit to Construct, Permit status (S)

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2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

2.1 Application Scope

This permitting action is for a Tier II revision for the ownership change to the facility.

2.2 Application Chronology

October 6, 2008 DEQ received the application requesting ownership change

November 4, 2008 DEQ declared the application complete

3. TECHNICAL ANALYSIS

Technical analysis is not required because the permitting action is for an ownership change to the facility. No changes are made except for minor revisions to Permit Conditions 2.8 and 2.9 due to using the current template. New text is shown in bold. Deletions are shown as ~~strikeout text~~.

“2.8 Each month that the facility is operated, the permittee shall conduct a facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. **Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either**

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) 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%, as measured using Method 9, 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 its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emission 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.

[12/17/08]

~~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~~

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"2.9 The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA58.01.01.600-623+6."

4. REGULATORY REVIEW

Regulatory review is not required because no changes are made to the facility; no new regulations are triggered.

5. PERMIT FEES

In accordance with IDAPA 58.01.01.407.02.c, the processing fee is not required for an ownership change of a Tier II.

6. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.404.04, public comment is not required because this revision is for an ownership change of the facility; there is also no emissions increase.

Appendix A – AIRS Information

There are no changes to the facility-wide classification resulting from this permitting action (compare to form with last permit.)