



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

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

March 30, 2011

Rhys Weaver, Vice President, Clyde Companies Inc.  
Sunroc Corporation, dba Clements Concrete Company  
730 North 1500 West  
Orem, UT 84057

RE: Facility ID No. 001-00184, Sunroc Corporation, dba Clements Concrete Company, Boise  
Tier II Operating Permit Revision - Transfer of Ownership

Dear Mr. Weaver:

This letter acknowledges receipt on March 7, 2011, of a request for the transfer of ownership for a Tier II Operating Permit, in accordance with IDAPA 58.01.01.404.04 (Rules for the Control of Air Pollution in Idaho). The transfer of ownership request is for Permit No. T2-2008.0059, issued on November 20, 2007 and is based on the following information:

**Current Permittee Information**

Permittee: Clements Concrete Company (formerly Mike's Sand and Gravel)  
Mailing Address: 10988 Joplin Road, Boise, Idaho 83714  
Responsible Official: Michael R. Matzdorff  
Phone Number: (208) 939-2000; cell (208) 869-2111  
Person to Contact: Michael R. Matzdorff  
Phone Number: (208) 939-2000; cell (208) 869-2111

**Proposed Permittee Information**

Permittee: Sunroc Corporation, dba Clements Concrete Company  
Mailing Address: 10988 Joplin Road, Boise, Idaho 83714  
Responsible Official: Michael R. Matzdorff  
Phone Number: (208) 939-2000; cell (208) 869-2111  
Person to Contact: Michael R. Matzdorff  
Phone Number: (208) 939-2000; cell (208) 869-2111

**DEQ is only revising the cover page of the Tier II Operating Permit. All other information in the permit remains the same.**

Sunroc Corporation, dba Clements Concrete Company, Boise  
March 30, 2011  
Page 2 of 2

Attached to this letter is revised Tier II Operating Permit No. T2-2008.0059 with the revised cover page reflecting the transfer of ownership. The effective date of the Tier II Operating Permit transfer is March 30, 2011. DEQ recommends that you maintain a copy of this letter for your records.

This transfer does not release Sunroc Corporation, dba Clements Concrete Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. If you have any questions, please contact Kelli Wetzel at 208.373.0575 or [kelli.wetzel@deq.idaho.gov](mailto:kelli.wetzel@deq.idaho.gov).

Sincerely,



Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS/KW

Attachment

cc: Michael R. Matzdorff  
10988 Joplin Road  
Boise, ID 83714

Permit No. T2-2008.0059 PROJ 60841



**Air Quality  
TIER II OPERATING PERMIT**

State of Idaho  
Department of Environmental Quality

**PERMIT No.:** T2-2008.0059

**FACILITY ID No.:** 001-00184

**AQCR:** 64      **CLASS:** B      **UTM ZONE:** 11

**SIC:** 1442      **NAICS:** 212321

**UTM COORDINATE (km):** 555.0 , 4835.4

**1. PERMITTEE**

Sunroc Corporation, dba Clements Concrete Company

**2. PROJECT**

Project No. 60841, Change in Ownership

**3. MAILING ADDRESS**

10988 Joplin Road

**CITY**

Boise

**STATE**

ID

**ZIP**

83714

**4. FACILITY CONTACT**

Michael R. Matzdorff

**TITLE**

Vice President and General Manager

**TELEPHONE**

(208) 939-2000; cell (208) 869-2111

**5. RESPONSIBLE OFFICIAL**

Michael R. Matzdorff

**TITLE**

Vice President and General Manager

**TELEPHONE**

(208) 939-2000; cell (208) 869-2111

**6. EXACT PLANT LOCATION**

2500 feet north of Joplin Road

**COUNTY**

Ada

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

Gravel mining, crushing, retail sales

**8. PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400 through 410, and pertains only to emissions of air contaminants 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 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.

KELLI WETZEL, PERMIT WRITER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

<b>Date Issued:</b>	November 20, 2007
<b>Date Modified/Revised:</b>	March 30, 2011
<b>Date Expires:</b>	November 20, 2012

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## Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BMPs	Best Management Practices
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
NAICS	North American Industry Classification System
lb/hr	pounds per hour
O&M	Operation and Maintenance
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SIP	State Implementation Plan
T/yr	tons per year
UTM	Universal Transverse Mercator

<b>AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-2008.0059</b>		
<b>Permittee:</b>	Clements Concrete Company	<b>Facility ID No. 001-00184</b>
<b>Location:</b>	Boise, Idaho	

**1. TIER II OPERATING PERMIT SCOPE**

***Purpose***

- 1.1 The purpose of this permit is for a change in ownership of the facility to Clements Concrete Company.
- 1.2 This Tier II operating permit replaces the following permits, the terms and conditions of which shall no longer apply:
  - Tier II operating permit No. T2-2007.0122, issued November 20, 2007.
  - Tier II operating permit No. T2-040030, issued February 10, 2005, permit revision changing the name of the ownership of the facility and deleting all requirements in the existing permit related to 40 CFR 60, Subpart OOO.
  - Tier II operating permit No. T2-000038, issued July 12, 2002, initial facility-wide permit

***Regulated Sources***

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

**Table 1.1 SUMMARY OF REGULATED SOURCES**

Permit Section	Source Description	Emissions Control
1 through 5	Primary crushing Secondary crushing Conveyor transfer point Truck loading Vehicle traffic (unpaved roads) Active stockpile Inactive stockpile Primary screen Secondary screen Top soil screen Vehicle traffic (paved roads) Front end loader traffic Bulldozer traffic	Best Management Practices (BMPs)

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<b>Permittee:</b>	Clements Concrete Company
<b>Location:</b>	Boise, Idaho

**Facility ID No. 001-00184**

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

### ***Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent 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 dust.
  - Paving of roadways and their maintenance in a clean condition, where practical.
  - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 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.

### ***Odors***

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

***Visible Emissions***

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions 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.

***Open Burning***

- 2.9 The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.600-623.

***Reports and Certifications***

- 2.10 Any reporting required by this permit, including but not limited to records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications 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. Any reporting required by this permit, **with the exception of a Portable Equipment Registration and Relocation form**, shall be submitted to the following address:

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**Permittee:** Clements Concrete Company

**Location:** Boise, Idaho

**Facility ID No. 001-00184**

Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1445 N. Orchard  
Boise, ID 83706-2239  
Phone: (208) 373-0550  
Fax: (208) 373-0287

***Sulfur Content***

- 2.11 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
- ASTM Grade 1 fuel oil - 0.3% by weight.
  - ASTM Grade 2 fuel oil - 0.5% by weight.
- 2.12 The permittee shall maintain documentation of supplier verification of distillate fuel oil content on an as-received basis.

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<b>Location:</b>	Boise, Idaho

**Facility ID No. 001-00184**

### **3. THE SAND AND GRAVEL PLANT**

#### **3.1 Process Description**

This facility is a gravel mining, crushing, and screening facility. The equipment includes crushers, screens, conveyors, stockpiles, and trucks. The maximum hourly throughput of the crushing and screening plant is 550 T/hr. Electricity is supplied to the facility by the local utility.

#### **3.2 Emission Control Description**

The permittee controls emissions from the various emission units through the use of reasonable control of fugitive emissions and best management practices as explained in Permit Conditions 3.7 and 3.8.

#### ***Emission Limits***

#### **3.3 Emissions Limits**

In accordance with the State Implementation Plan, 40 CFR 52.670(d), EPA-approved State Source-specific Requirements:

- PM<sub>10</sub> emissions from the sand and gravel transfers, crushers, screens, vehicle traffic, and wind erosion of stockpiles shall not exceed 12.32 lb/hr.
- PM<sub>10</sub> emissions from the sand and gravel transfers, crushers, screens, vehicle traffic, and wind erosion of stockpiles shall not exceed 18.5 tons per any consecutive 12-calendar month period.

#### **3.4 Visible Emission Limit**

In accordance with the State Implementation Plan, 40 CFR 52.670(d), EPA-approved State Source-specific Requirements, visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by EPA Reference Method 22 (as described in 40 CFR 60 and presented below) or a DEQ-approved alternative method.

#### ***Method 22—Visual Determination of Fugitive Emissions From Material Sources and Smoke Emissions From Flares***

This method is not inclusive with respect to observer certification. Some material is incorporated by reference from Method 9.

##### ***1.0 Scope and Application***

This method is applicable for the determination of the frequency of fugitive emissions from stationary sources, only as specified in an applicable subpart of the regulations. This method also is applicable for the determination of the frequency of visible smoke emissions from flares.

##### ***2.0 Summary of Method***

2.1 Fugitive emissions produced during material processing, handling, and transfer operations or smoke emissions from flares are visually determined by an observer without the aid of instruments.

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2.2 This method is used also to determine visible smoke emissions from flares used for combustion of waste process materials.

2.3 This method determines the amount of time that visible emissions occur during the observation period (i.e., the accumulated emission time). This method does not require that the opacity of emissions be determined. Since this procedure requires only the determination of whether visible emissions occur and does not require the determination of opacity levels, observer certification according to the procedures of Method 9 is not required. However, it is necessary that the observer is knowledgeable with respect to the general procedures for determining the presence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training is to be obtained from written materials found in References 1 and 2 or from the lecture portion of the Method 9 certification course.

### 3.0 Definitions

3.1 Emission *frequency* means the percentage of time that emissions are visible during the observation period.

3.2 Emission *time* means the accumulated amount of time that emissions are visible during the observation period.

3.3 Fugitive *emissions* means emissions generated by an affected facility which is not collected by a capture system and is released to the atmosphere. This includes emissions that (1) escape capture by process equipment exhaust hoods; (2) are emitted during material transfer; (3) are emitted from buildings housing material processing or handling equipment; or (4) are emitted directly from process equipment.

3.4 Observation *period* means the accumulated time period during which observations are conducted, not to be less than the period specified in the applicable regulation.

3.5 Smoke *emissions* means a pollutant generated by combustion in a flare and occurring immediately downstream of the flame. Smoke occurring within the flame, but not downstream of the flame, is not considered a smoke emission.

### 4.0 Interferences

4.1 Occasionally, fugitive emissions from sources other than the affected facility (e.g., road dust) may prevent a clear view of the affected facility. This may particularly be a problem during periods of high wind. If the view of the potential emission points is obscured to such a degree that the observer questions the validity of continuing observations, then the observations shall be terminated, and the observer shall clearly note this fact on the data form.

### 5.0 Safety

5.1 Disclaimer. This method may involve hazardous materials, operations, and equipment. This test method may not address all of the safety problems associated with its use. It is the responsibility of the user of this test method to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to performing this test method.

### 6.0 Equipment

6.1 Stopwatches (two). Accumulative type with unit divisions of at least 0.5 seconds.

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6.2 Light Meter. Light meter capable of measuring illuminance in the 50 to 200 lux range, required for indoor observations only.

*7.0 Reagents and Supplies [Reserved]*

*8.0 Sample Collection, Preservation, Storage, and Transfer [Reserved]*

*9.0 Quality Control [Reserved]*

*10.0 Calibration and Standardization [Reserved]*

*11.0 Analytical Procedure*

11.1 Selection of Observation Location. Survey the affected facility or the building or structure housing the process to be observed, and determine the locations of potential emissions. If the affected facility is located inside a building, determine an observation location that is consistent with the requirements of the applicable regulation (i.e., outside observation of emissions escaping the building/structure or inside observation of emissions directly emitted from the affected facility process unit). Select a position that enables a clear view of the potential emission point(s) of the affected facility or of the building or structure housing the affected facility, as appropriate for the applicable subpart. A position at least 4.6 m (15 feet), but not more than 400 m (0.25 miles), from the emission source is recommended. For outdoor locations, select a position where the sunlight is not shining directly in the observer's eyes.

11.2 Field Records.

11.2.1 Outdoor Location. Record the following information on the field data sheet (Figure 22-1): Company name, industry, process unit, observer's name, observer's affiliation, and date. Record also the estimated wind speed, wind direction, and sky condition. Sketch the process unit being observed, and note the observer location relative to the source and the sun. Indicate the potential and actual emission points on the sketch.

11.2.2 Indoor Location. Record the following information on the field data sheet (Figure 22-2): Company name, industry, process unit, observer's name, observer's affiliation, and date. Record as appropriate the type, location, and intensity of lighting on the data sheet. Sketch the process unit being observed, and note the observer location relative to the source. Indicate the potential and actual fugitive emission points on the sketch.

11.3 Indoor Lighting Requirements. For indoor locations, use a light meter to measure the level of illumination at a location as close to the emission source(s) as is feasible. An illumination of greater than 100 lux (10 foot candles) is considered necessary for proper application of this method.

11.4 Observations.

11.4.1 Procedure. Record the clock time when observations begin. Use one stopwatch to monitor the duration of the observation period. Start this stopwatch when the observation period begins. If the observation period is divided into two or more segments by process shutdowns or observer rest breaks (see Section 11.4.3), stop the stopwatch when a break begins and restart the stopwatch without resetting it when the break ends. Stop the stopwatch at the end of the observation period. The accumulated time indicated by this stopwatch is the duration of observation period. When the observation period is completed, record the clock time. During the observation period, continuously watch the emission source. Upon observing an emission (condensed water vapor is not considered an emission), start the second accumulative stopwatch; stop the watch when the emission stops. Continue this procedure for the entire

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observation period. The accumulated elapsed time on this stopwatch is the total time emissions were visible during the observation period (i.e., the emission time.)

11.4.2 Observation Period. Choose an observation period of sufficient length to meet the requirements for determining compliance with the emission standard in the applicable subpart of the regulations. When the length of the observation period is specifically stated in the applicable subpart, it may not be necessary to observe the source for this entire period if the emission time required to indicate noncompliance (based on the specified observation period) is observed in a shorter time period. In other words, if the regulation prohibits emissions for more than six-minutes in any hour, then observations may (optional) be stopped after an emission time of six-minutes is exceeded. Similarly, when the regulation is expressed as an emission frequency and the regulation prohibits emissions for greater than 10% of the time in any hour, then observations may (optional) be terminated after six-minutes of emission are observed since six minutes is 10% of an hour. In any case, the observation period shall not be less than six minutes in duration. In some cases, the process operation may be intermittent or cyclic. In such cases, it may be convenient for the observation period to coincide with the length of the process cycle.

11.4.3 Observer Rest Breaks. Do not observe emissions continuously for a period of more than 15 to 20 minutes without taking a rest break. For sources requiring observation periods of greater than 20 minutes, the observer shall take a break of not less than five minutes and not more than 10 minutes after every 15 to 20 minutes of observation. If continuous observations are desired for extended time periods, two observers can alternate between making observations and taking breaks.

11.5 Recording Observations. Record the accumulated time of the observation period on the data sheet as the observation period duration. Record the accumulated time that emissions were observed on the data sheet as the emission time. Record the clock time that the observation period began and ended, as well as the clock time any observer breaks began and ended.

*12.0 Data Analysis and Calculations*

If the applicable subpart requires that the emission rate be expressed as an emission frequency (in percent), determine this value as follows: Divide the accumulated emission time (in seconds) by the duration of the observation period (in seconds) or by any minimum observation period required in the applicable subpart, if the actual observation period is less than the required period, and multiply this quotient by 100.

*13.0 Method Performance [Reserved]*

*14.0 Pollution Prevention [Reserved]*

*15.0 Waste Management [Reserved]*

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<b>Location:</b>	Boise, Idaho	

***Operating Requirements***

**3.5 Operating Procedures**

The sand and gravel transfers, crushers, screens, and associated processes shall be operated according to the respective operation and maintenance (O&M) manual and manufacturer’s specifications during the operation.

**3.6 Sand and Gravel Mining/Processing**

- The material processed shall not exceed 13,200 tons per calendar day.
- In accordance with the State Implementation Plan, 40 CFR 52.670(d), EPA-approved State Source-specific Requirements, the material processed shall not exceed 600,000 tons per any consecutive 12-calendar month period.

**3.7 Reasonable Control of Fugitive Emissions**

As required in IDAPA 58.01.01.651, all reasonable precautions shall be taken to prevent PM from becoming airborne. 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 PM.

Some of the reasonable precautions include, but are not limited to, the following:

- Using water or chemicals for controlling dust when demolishing existing buildings or structures, performing construction operations, grading roads, and clearing of lands.
- Applying asphalt, water or suitable chemicals to, or covering, dirt roads, material stockpiles, and other surfaces that can create dust.
- Installing and using hoods, fans and fabric filters, or equivalent systems to enclose and vent the dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and maintaining them in a clean condition.
- Promptly removing earth or other stored material from streets.

**3.8 Fugitive Dust Best Management Practice**

Clements Concrete Company shall use BMPs as defined by IDAPA 58.01.01.011.01 to control the emissions of fugitive dust. Clements Concrete Company shall control the fugitive emissions at each site of operations for the duration of operations at each site.

**3.8.1 Vehicle Track-out BMPs**

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

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- 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 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 to control fugitive dust emissions from track-out onto paved public roadways include, but are not limited to:

- 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.

### **3.8.2 Unpaved Haul Roads BMPs**

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.

Strategies to the control fugitive dust emissions from unpaved haul roads include, but are not limited to:

- 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 route which clearly indicate the speed limit. Signs shall be placed so they are visible 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.

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- 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 controls strategy or strategies as approved by DEQ.

**3.8.3 Transfer point, screening operations, and stacks and vents BMPs**

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, and capture systems include but are not limited to:

- Opacity greater than 20% from any transfer point on a belt conveyor or conveying system.
- 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 to control fugitive dust emissions for transfer points, belt conveyors, bucket elevators, screening operations, conveying systems, capture systems, and building vents include but are not limited to:

- Limit drop heights of materials such that a homogeneous flow of material is maintained.
- Install, operate, and maintain water supply bars to control fugitive dust emissions at transfer points on belt conveyors, conveyor systems, bucket elevators, and screening operations as necessary.
- Other control strategy or strategies as approved by DEQ.

Strategies for the control of fugitive emissions from any crusher, grinding mill, or building vent that shall be applied on frequency such that visible fugitive emissions do not exceed any applicable opacity limit.

- Limit drop heights of materials such that a homogeneous flow of material is maintained.
- 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.

**3.8.4 Stockpiles BMPs**

Triggers that require immediate initiation of a strategy or strategies to control fugitive dust emissions from stockpiles include but are 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.

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- 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 for control of fugitive emission from stockpiles include but are not limited to:

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

***Monitoring and Recordkeeping Requirements***

**3.9 Monitoring Operation Parameters**

The permittee shall monitor and record the following process data. The most recent five years' compilation of records shall be kept onsite, in a record, and shall be made available to DEQ representatives upon request.

- Each calendar day, the amount of material processed that day while the plant is operating.
- Each month, the amount of material processed of that month, and the material processed for the most recent 12-calendar month period, in accordance with the State Implementation Plan, 40 CFR 52.670(d), EPA-approved State Source-specific Requirements.

**3.10 Monitor Visible Emissions**

The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions, to comply with Permit Condition 2.2. If visible emissions are observed leaving the property boundary 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 monthly visible emission inspection. The most recent two years' records shall be kept onsite, and shall be made available to DEQ representatives upon request.

**3.11 Operations and Maintenance (O&M) Manual Requirements**

The permittee shall have developed an O&M manual describing the dust control procedures for the sand and gravel transfers, crushers, screens, vehicle traffic, and associated processes to comply with this permit, including General Provision 2. This manual shall remain onsite at all times and shall be made available to DEQ representatives upon request. A copy of the manual shall be submitted to DEQ's Boise Regional Office at the following address upon receiving this permit:

Air Quality Permit Compliance  
Department of Environmental Quality, Boise Regional Office  
1445 N. Orchard  
Boise, ID 83706-2239

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**4. SUMMARY OF EMISSION RATE LIMITS**

4.1 Table 4.1 provides a summary of all emission rate limits required by this permit.

**Table 4.1 SUMMARY OF EMISSION RATE LIMITS**

Source Description	PM <sub>10</sub> <sup>c</sup>	
	lb/hr	T/yr <sup>d</sup>
Sand and gravel transfers, crushers, screens, vehicle traffic, and wind erosion of stockpiles	12.32	18.5

- <sup>a</sup> As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.
- <sup>b</sup> 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.
- <sup>c</sup> Includes condensibles
- <sup>d</sup> Year is a consecutive 12-calendar month period

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**5. TIER II PERMIT TO OPERATE 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)]