



# **Air Quality Permitting Response to Public Comments**

**July 8, 2016**

**Permit to Construct No. P-2016.0006  
Project No. 61673**

**CD'A Redi Mix  
Post Falls, Idaho**

**Facility ID No. 055-00125**

Prepared by:  
Craig Woodruff, Permit Writer *CW*  
AIR QUALITY DIVISION

**Final**

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## BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct the CD'A Redi Mix from May 31, 2016 through June 30, 2016, in accordance with IDAPA 58.01.01.209.01.c. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

## PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at:

<http://adm.idaho.gov/adminrules/rules/idapa58/0101.pdf>.

**Comment 1:** **Idaho Conservation League** – DEQ is calculating PM<sub>10</sub> emissions from truck-mix locations using an equation that includes variables for wind speed and moisture content of cement. DEQ selected 7 mph for wind speed and 6% for moisture content, stating these are average values for these variables. However, footnote 1 (p. 6) it states that average moisture contents for aggregate and sand are 1.77% and 4.17%, respectively. It is unclear why DEQ states they selected average values for moisture content in the text when the value selected disagrees with the average values that appear to have been calculated by the EPA according to the footnote. DEQ should calculate PM<sub>10</sub> emissions using a value that combines average moisture content for sand and aggregate.

**Response 1:** There was a typographical error in the description of moisture content selection. The values that were used to calculate PM<sub>10</sub> were 4.17% for sand moisture content and 1.77% for aggregate moisture content as provided in AP-42. Each constituent was analyzed separately for PM<sub>10</sub>. The correction will be made to the Statement of Basis, however no changes will be seen in permit limits as PM<sub>10</sub> calculations were based on emission factors in AP-42 Tables 11.12-5 and 11.12-6, which account for the different moisture contents.

**Comment 2:** **Idaho Conservation League** – It appears the incorrect formula was used to calculate new equipment process weight (PW) emission-rate limitations. DEQ's Statement of Basis selected the following equation to calculate PW-based emission-rates:

$$E=1.12(PW)^{0.27}$$

As stated in IDAPA 58.01.01.702.01.b, this equation is to be used for equipment that commenced operation prior to October 1, 1979 and has a  $PW \geq 17,000$  lb/hr. As this PTC application is for a new facility, the commencement date for this equipment should be after October 1, 1979. The following equation, taken from IDAPA 58.01.01.701.01.b, should therefore be used:

$$E=1.10(PW)^{0.25}$$

Utilizing this new equation yields a PM emission rate of 33.74 lb-PM/hr. DEQ's calculations using emission inventory emission rates still demonstrates compliance using this equation. However, it's important to use the appropriate equation in case any changes are made to this facility in the future that might bring PM emissions closer to this permissible value.

**Response 2:** The incorrect equation was used for the process weight rate calculation. The Statement of Basis will be updated to reflect the new process weight rate limitation utilizing the correct equation.

**Appendix**

**Public Comments Submitted for**

**Permit to Construct**

**P-2016.0006**



[www.idahoconservation.org](http://www.idahoconservation.org)

**Idaho Conservation League**

PO Box 844, Boise, ID 83701  
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6/17/16

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DEQ State Office  
Air Quality Division  
1410 N. Hilton  
Boise, ID 83706

Submitted via email: [craig.woodruff@deq.idaho.gov](mailto:craig.woodruff@deq.idaho.gov)

**RE: CDA Redi Mix PTC number P-2016.0006**

Dear Mr. Woodruff:

Thank you for the opportunity to comment on the draft air permit for the proposed general air quality permit to construct (PTC) for CDA Redi Mix in Post Falls, ID.

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality.

Our detailed comments are attached at the end of this letter. Please do not hesitate to contact me at 208-345-6933 ext. 23 or [ahopkins@idahoconservation.org](mailto:ahopkins@idahoconservation.org) if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,

Austin Hopkins  
Conservation Assistant

*RE: Idaho Conservation League comments on PTC No. P-2016.0006*

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### Moisture Content Mean Value

DEQ is calculating PM<sub>10</sub> emissions from truck-mix locations using an equation that includes variables for wind speed and moisture content of cement. DEQ selected 7 mph for wind speed and 6% for moisture content, stating these are average values for these variables. However, footnote 1 (p. 6) it states that average moisture contents for aggregate and sand are 4.17% and 1.77%, respectively. It is unclear why DEQ states they selected average values for moisture content in the text when the value selected disagrees with the average values that appear to have been calculated by the EPA according to the footnote. DEQ should calculate PM<sub>10</sub> emissions using a value that combines average moisture content for sand and aggregate.

### Particulate Matter Emission Calculations

It appears the incorrect formula was used to calculate new equipment process weight (PW) emission-rate limitations. DEQ's Statement of Basis selected the following equation to calculate PW-based emission-rates:

$$E=1.12(PW)^{0.27}$$

As stated in IDAPA 58.01.01.702.01.b, this equation is to be used for equipment that commenced operation prior to October 1, 1979 and has a PW  $\geq$  17,000 lb/hr. As this PTC application is for a new facility, the commencement date for this equipment should be after October 1, 1979. The following equation, taken from IDAPA 58.01.01.701.01.b, should therefore be used:

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Utilizing this new equation yields a PM emission rate of 33.74 lb-PM/hr. DEQ's calculations using emission inventory emission rates still demonstrates compliance using this equation. However, it's important to use the appropriate equation in case any changes are made to this facility in the future that might bring PM emissions closer to this permissible value.