



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippetts, Director

March 24, 2017

John S. Logren, Vice President
Interstate Concrete & Asphalt
P.O. Box 3366
Spokane, WA 99220

RE: Facility ID No. 777-00371, P-2017.0006 Project 61842, Interstate Concrete & Asphalt
Transfer of Ownership by Permit to Construct Revision

Dear Mr. Logren:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2017.0006 Project 61842 to Interstate Concrete & Asphalt, for a portable concrete batch plant for a transfer of ownership. This PTC is issued in accordance with IDAPA 58.01.01.209.04 of the Rules for the Control of Air Pollution in Idaho and is based on the certified information received on January 23, 2017. The transfer of ownership is based on the following information:

Previous Permittee Information

Permittee: Hap Taylor & Sons dba Knife River
Mailing Address: 32260 Old Highway 34, Tangent, OR 97389
Facility Location: portable
Facility Contact: Jeff Steyaert, Regional Environmental Manager
Phone Number: (541) 928-6491

Updated Permittee Information

Permittee: Interstate Concrete & Asphalt
Mailing Address: P.O. Box 3366, Spokane, WA 99220
Facility Location: portable
Facility Contact: Paul Franz, General Manager
Phone Number: (509) 534-6221
E-mail Address: pfranz@oldcastlematerials.com
Responsible Official: John S. Logren, Vice President
Phone Number: (509) 534-6221

This permit is effective immediately and replaces PTC No. P-050124, issued March 8, 2006. This permit does not release Interstate Concrete & Asphalt from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Air Quality Analyst, at (208) 666-4600 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that 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.

If you have any questions, please contact Morrie Lewis at (208) 373-0502 or Morrie.Lewis@deq.idaho.gov.

Sincerely,

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

Mike Simon
Stationary Source Program Manager
Air Quality Division

Attachment

MS/ML Permit No. P-2017.0006 PROJ 61842

Air Quality

PERMIT TO CONSTRUCT

Permittee Interstate Concrete & Asphalt
Permit Number P-2017.0006
Project ID 61842
Facility ID 777-00371
Facility Location Portable

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) 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; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) 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; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho 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. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued March 24, 2017



Morrie Lewis, Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) to transfer ownership of a portable concrete batch plant.
- 1.2 This PTC replaces Permit to Construct No. P-050124, issued on March 8, 2006.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment	Emissions Point
2	<u>Portable ready-mix plant</u> Manufacturer: Con-E-Co Model: Lo Pro-12 Max. hourly throughput: 300 cubic yards per hour	<u>Four Baghouses</u> Silo baghouse No.1 and No.2 Two batcher vent baghouses (truck mix and central mix)	<u>Silo Baghouse No.1</u> Model No.: 14-23 Stack ht.: 13.8 m Diameter: 0.28 m Velocity: 0.001 m/s Temp.: 293 K <u>Silo Baghouse No.2</u> Model No.: 14-23 Stack ht.: 17.1 m Diameter: 0.28 m Velocity: 0.001 m/s Temp.: 293 K <u>Two Batcher Vent Baghouses</u> (truck mix and central mix) Model No. PJ-980 Stack ht.: 4.9 m Diameter: 0.2 m Velocity: 0.001 m/s Temp.: 293 K Model No. PJ-980 Stack ht.: 11.7 m Diameter: 0.52 m Velocity: 0.001 m/s Temo.: 293 K
2	<u>Emergency generator</u> Manufacturer: Caterpillar Model: 3406 Construction date: prior to 2006 Rated heat input capacity: 320 kW Fuel type: No.2 fuel oil	None	None

2 Concrete Batch Plant

2.1 Process Description

Interstate Concrete & Asphalt operates a portable ready-mix concrete plant. Aggregate, sand, and coarse material are transferred by conveyor from bins to a truck for in-transit mixing or a central mix drum for mixing onsite. Cement and flyash are also measured and mixed in a batcher that has a dust collector. From the batcher, the cement/flyash mixture is added to the aggregate at the truck/drum loading location. The cement and flyash silos are equipped with dust collectors.

A baghouse is located at the loading transfer point to capture particulate matter emitted during the loading process. The ready-mix plant consists of an aggregate storage bin, batcher, silos, and conveyors, all supplied as one portable unit. Electric power is supplied to the ready-mix plant from the local power grid.

Emergency back-up power is provided by a Caterpillar generator operating on No.2 diesel fuel.

2.2 Control Device Descriptions

Table 2.1 Cement Storage Silo Description

Emissions Units / Processes	Control Devices	Emission Points
Concrete batch plant Manufacturer: Con-E-Co Model: Lo Pro-12 Max. hourly throughput: 300 cubic yards per hour	Four Baghouses	Silo Baghouse No.1 stack
	Silo baghouses No. 1 and No.2	Silo Baghouse No.2 stack
	Two batcher vent baghouses (truck mix and central mix)	Batcher Vent Baghouse No. 1 stack
		Batcher Vent Baghouse No. 2 stack

Emission Limits

2.3 Emission Limits

The PM₁₀ emissions from the concrete batch plant stacks, including PM₁₀ emissions from the electrical generator stack, shall not exceed 31.3 lb/day.

2.4 Opacity Limit

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

2.5 Transfer Point Emissions Limit

Emissions from any transfer point, belt conveyors, or from any other affected source shall not exhibit greater than 10% opacity. Opacity shall be determined by the test methods and procedures contained in IDAPA 58.01.01.625.04.

2.6 Fugitive Emissions at the Property Boundary

Visible fugitive emissions shall not be observed leaving the property boundaries exceeding a period or periods aggregating more than one minute in any 60-minute period. This visual determination is to be conducted using Method 22, 40 CFR 60, Appendix A.

Operating Requirements

2.7 Hours of Operation

The concrete batch plant, including the electrical generator, shall not operate for more than 10 hours per day.

2.8 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. 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, when 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.

2.9 Operations and Maintenance Manual Requirements

Within 60 days following permit issuance, the permittee shall have developed an O&M manual for the air pollution control devices describing the procedures that shall be followed to comply with the general compliance requirements in the General Provisions of this permit and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

2.10 Fugitive Emissions from Haul Roads, Traffic Areas, and Stockpiles

Fugitive PM emissions from traffic or haul roads, traffic areas, and aggregate stockpiles shall be reasonably controlled as required by IDAPA 58.01.01.650 and IDAPA 58.01.01.651. This shall include, but is not limited to, applications of water or environmentally-safe chemical dust suppressants.

2.11 Pressure Drop Across Air Pollution Control Devices

The pressure drop across the air pollution control devices shall be maintained within manufacturer and O&M manual specifications. Documentation of both manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

2.12 Visible Emission Inspection

The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. 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 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 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.

2.13 Operating Parameters

The following operating parameters shall be monitored and recorded when operating. The records of this required information shall be kept onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

- Pressure drop reading across the air pollution control devices once per week
- Daily hours of operation of the concrete batch plant
- Daily hours of operation of the generator

2.14 Reasonable Control Measures

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.

Nonattainment Area Requirements

The permittee shall comply with the following permit conditions when the concrete batch plant is operated in any PM₁₀ nonattainment area within the state of Idaho.

2.15 PM₁₀ Nonattainment Area Operations

The permittee shall not operate the concrete batch plant in any PM_{2.5} nonattainment area or PM₁₀ nonattainment area under this permit. The permittee shall submit an air quality permit to construct application which requests the ability to locate and operate the concrete batch plant within a PM₁₀ nonattainment area. As of the date of this permit, nonattainment areas in north Idaho include the

West Silver Valley Nonattainment Area near Pinehurst. Contact DEQ for more specific details about the nonattainment area boundaries.

Reporting Requirements

2.16 Relocation

All existing portable equipment shall be registered. At least 10 days prior to relocation of any equipment covered by this permit, the permittee shall submit a scaled plot plan and a complete Portable Equipment Registration and Relocation Form (available for download on DEQ's website) in accordance with IDAPA 58.01.01.500, to the following address:

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

NESHAP Subpart ZZZZ Requirements

2.17 NESHAP Subpart ZZZZ – Fuel Requirements

The permittee shall use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased prior to January 1, 2015 may be used until depleted..

2.18 NESHAP Subpart ZZZZ – Emergency Operation

The permittee shall operate the generator engine only to provide electrical power or mechanical work during an emergency situation, in accordance with 40 CFR 63.6640(f) and as provided in 40 CFR 63.6675.

- There is no time limit on the use of emergency stationary RICE in emergency situations.
- Any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. The permittee may operate the emergency generator engine for these purposes for a maximum of 100 hours per calendar year.
- The emergency generator engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition DEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

2.19 NESHAP Subpart ZZZZ – Maintenance

In accordance with 40 CFR 63.6603, the permittee shall comply with the following requirements for the emergency generator engine:

- Change oil and filter every 500 hours of operation or annually, whichever comes first (or comply with utilizing an oil analysis program as described in 40 CFR 63.6625(i) or (j) in order to extend the specified oil change requirement);

- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

2.20 NESHAP Subpart ZZZZ – Maintenance and Operation

In accordance with 40 CFR 63.6625(e) and (h), the permittee shall operate and maintain the emergency generator engine and after-treatment control device (if any) according to the manufacturer's emission-related written instructions, or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

2.21 NESHAP Subpart ZZZZ – General Compliance

In accordance with 40 CFR 63.6605, the permittee shall be in compliance with the emission limitations, operating limitations, and other applicable requirements in this 40 CFR 63, Subpart ZZZZ at all times. The permittee shall operate and maintain any affected source (emergency generator engine), including associated air pollution control equipment and monitoring equipment at all times and in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

2.22 NESHAP Subpart ZZZZ – Hours Monitoring

In accordance with 40 CFR 63.6625(f), the permittee shall install a non-resettable hour meter on the emergency generator engine (if one is not already installed).

2.23 NESHAP Subpart ZZZZ – Work or Management practices

In accordance with 40 CFR 63.6640, the permittee shall demonstrate continuous compliance with each emission limitation, operating limitation, and other applicable requirements. The permittee shall report each instance in which each emission limitation or operating limitation was not met. These instances are deviations from the emission and operating limitations in Subpart ZZZZ and shall be reported according to the requirements in 40 CFR 63.6650.

- Operating and maintaining the emergency generator engine according to the manufacturer's emission-related operation and maintenance instructions; or
- Develop and follow a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

2.24 NESHAP Subpart ZZZZ – Recordkeeping

In accordance with 40 CFR 63.6655 and 40 CFR 63.6660, the permittee shall keep the records described in 40 CFR 63.6655.

- Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- Records of all required maintenance performed on the air pollution control and monitoring equipment.
- Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- Records of the maintenance conducted on the emergency generator engine to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to a maintenance plan.
- Records of the hours of operation of the engine recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.
- Records shall be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).
- Record shall be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- Records shall be readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.

3 General Provisions

General Compliance

3.1 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, 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.]

3.2 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]

3.3 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

3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 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

3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- 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; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7** 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.
- 3.8** 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.
- 3.9** Within 60 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 and 4/11/15]

Monitoring and Recordkeeping

- 3.10** The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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, 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]

Excess Emissions

- 3.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 3.12 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

- 3.13 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

- 3.14 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

- 3.15 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

- 3.16 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 58.01.01.211, 5/1/94]