



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

224 South Arthur • Pocatello, Idaho 83204-3202 • (208) 236-6160

Dirk Kempthorne, Governor
C. Stephen Allred, Director

February 1, 2001

CERTIFIED MAIL # 7000 0520 0022 1060 8609

Mr. Alan Tyson, Superintendent
Castle Concrete Company, Inc.
2300 North Main
Pocatello, Idaho, 83201

RE: Castle Concrete Company, Portable/Pocatello P-000344
(Portable Concrete Batch Plant, Permit to Construct No. 777-00143)

Dear Mr. Tyson:

On January 30, 2001, the Idaho Department of Environmental Quality (DEQ) received a Permit to Construct (PTC) request from Castle Concrete Company, Inc. for a portable concrete batching facility. Castle Concrete Company, Inc. has purchased the facility from Monroc. The facility is currently located at Pocatello, Idaho. Based on review of the application and all applicable state and federal rules and regulations, DEQ finds that this project meets the provisions of IDAPA 16.01.01.200 (*Rules for the Control of Air Pollution in Idaho*). Enclosed is modified PTC No. 777-00143 for the portable concrete batching facility, which supersedes the previously issued PTC No. 777-00143.

This permit does not release the Permittee from compliance with all other applicable federal, state, local, or tribal laws, regulations, or ordinances. With regard to collocation with another portable facility, conservative assumptions were used to derive the throughput limitations. If this throughput is too restrictive for a particular project, contact DEQ prior to collocation and request a detailed site-specific analysis.

You are strongly encouraged to request a meeting with DEQ to discuss the permit terms and requirements with which your facility must comply. Mr. Rick Elkins of the Pocatello Regional Office will contact you regarding this meeting. DEQ strongly recommends that in addition to your facility's plant manager; your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions also attend the meeting.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street, Tenth Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision. However, DEQ encourages you to contact the State Air Quality Permit Program to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, contact Rick Elkins, at (208) 236-6160.

Sincerely,

A handwritten signature in black ink that reads "Mark Dietrich". The signature is written in a cursive style with a large initial "M" and "D".

Mark Dietrich
Regional Administrator
Applicable Regional Office

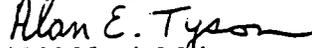
cc: DEQ State Office
Marilyn Seymore
EPA Region 10
Pocatello Regional Office

Jan. 29, 2000
Rick Elkins
Department of Environmental Quality

Mr. Elkins,

I, Alan E. Tyson, representing Castle Concrete Company Inc., submit this request for name change on permits # 777-00143 and # 777-00144, established on July 24, 2000 by Monroc Inc. Monroc Inc, has ceased their operations in SouthEast Idaho with whom i have been employed for nearly twelve years. Castle Concrete Company Inc. has purchased the Monroc Pocatello and Blackfoot operations and has asked me to be General Manager. Please accept my request for transfer with you on these permits. As before with Monroc, i am pleased to work with you on any questions or concerns regarding operations of our business as well as future business.

You may reach me personally at work-233-4151
mobile-680-2064
or at home-785-6994
Thank You

Castle Concrete Company Inc.
Alan E. Tyson

2300 North Main
Pocatello, Idaho
83204-2405

State of Idaho
Department of Environmental Quality

**PERMIT TO CONSTRUCT
AN AIR POLLUTION
EMITTING SOURCE**

PERMIT NUMBER

7 7 7 - 0 0 1 4 3

AQCR

CLASS

B

SIC

3 2 7 3

ZONE

UTM COORDINATE (km)

1. PERMITTEE

Castle Concrete Company, Inc.

2. PROJECT

Portable Concrete Batch Plant

3. MAILING ADDRESS

2300 North Main Street

CITY

Pocatello

STATE

Idaho

ZIP CODE

83201

4. SITE LOCATION COUNTY

Portable

NO. OF FULL-TIME EMPLOYEES

8

PROPERTY AREA AT SITE (Acreage)

Varies

5. PERSON TO CONTACT

Alan Tyson

TITLE

Plant Manager

TELEPHONE

(208) 233-4151

6. EXACT PLANT LOCATION

Portable/Pocatello

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Concrete Production (Including Aggregate, Asphalt, and Concrete Production when Collocated)

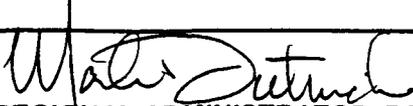
8. GENERAL CONDITIONS

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 16.01.01.200, and pertains only to emissions of air contaminants that are regulated by the state of Idaho and to the sources specifically allowed to be constructed 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 Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees, assumes 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 is not transferable to another person, place, piece or set of 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 of design or equipment may require Department approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 16.01.01.200, et.seq.


REGIONAL ADMINISTRATOR, POCATELLO REGIONAL OFFICE
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE: February 1, 2001

**PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION**

Monroc, Incorporated
Concrete Batch Plant
Portable

PERMIT NUMBER

7 7 7 - 0 0 1 4 3

SOURCE

Portable Concrete Batch Plant

A. STATEWIDE REQUIREMENTS

The Permittee shall comply with the following sourcewide conditions when the concrete batching facility is operated anywhere (nonattainment, attainment, or unclassifiable areas) within the state of Idaho.

A.1 EMISSION LIMITS

A.1.1 Opacity Limit

Emissions emanating from any stack, vent, or other functionally equivalent opening, shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required in IDAPA 16.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined using the procedures contained in IDAPA 16.01.01.625.

A.1.2 Visible Emission Limits at Property Boundary

Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. Visible emissions shall be determined by Method 22, as described in 40 CFR Part 60, Appendix A, or a DEQ-approved alternative method.

A.2 OPERATING REQUIREMENTS

A.2.1 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne as required in IDAPA 16.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions which might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

A.2.1.1 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;

A.2.1.2 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;

A.2.1.3 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;

A.2.1.4 Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;

A.2.1.5 Paving of roadways and their maintenance in a clean condition, where practical; or

A.2.1.6 Prompt removal of earth or other stored material from streets, where practical.

DATE: February 1, 2001

**PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION**

PERMIT NUMBER

Monroc, Incorporated
Concrete Batch Plant
Portable

7 7 7 - 0 0 1 4 3

SOURCE

Portable Concrete Batch Plant

A.2.2 Operations and Maintenance Manual Requirements

Within sixty (60) days after startup, the Permittee shall have developed an Operations and Maintenance (O&M) Manual for the air pollution control device which describes the procedures that shall be followed to comply with General Provision B and the air pollution control device requirements contained in this permit. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

A.2.3 Monitoring Equipment

The Permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to measure the pressure differential across the air pollution control equipment.

A.2.4 Pressure Drop Across Air Pollution Control Device

The pressure drop across the air pollution control device shall be maintained within the manufacturer's and O&M Manual's specifications. Documentation of both manufacturer's and O&M Manual's operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

A.3. MONITORING AND RECORDKEEPING REQUIREMENTS

A.3.1 Operating Parameters

The following operating parameters shall be monitored and recorded. The most recent two (2) years' compilation of data shall be kept on site, in a log, and shall be made available to DEQ representatives upon request.

A.3.1.1 Pressure drop across the air pollution control device once per week.

A.3.1.2 Concrete production in cubic yards per day (cy/day) and cubic yards per month (cy/mo).

A.3.2 Reasonable Control Measures

The Permittee shall monitor and record in a log, during operation, the periodic method(s) used to reasonably control fugitive emissions from this facility. The log shall include the type of control used (e.g., water, environmentally safe chemical dust suppressants, etc.) as well as the circumstances under which no controls are used. The most recent two (2) years' compilation of data shall be kept on site and shall be made available to DEQ representatives upon request.

A.4. REPORTING REQUIREMENTS

A.4.1 Relocation

DATE: February 1, 2001

**PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION****PERMIT NUMBER**

Monroc, Incorporated
Concrete Batch Plant
Portable

7 7 7 - 0 0 1 4 3

SOURCE

Portable Concrete Batch Plant

All existing portable equipment shall be registered. At least ten (10) days prior to relocation of any equipment covered by this permit, the Permittee shall submit a complete Portable Equipment Registration and Relocation Form (available on the DEQ website at: <http://www2.state.id.us/deq/air/air1.htm>) in accordance with IDAPA 16.01.01.500 and a scaled plot plan to:

PERF Processing Unit
Idaho DEQ - Air Quality
1410 North Hilton
Boise, Idaho 83706-1255

A.4.2 Certification of Documents

All documents, including, but not limited to, application forms for Permits to Construct, monitoring data, supporting information, requests for confidential treatment, testing reports, and compliance certifications submitted to DEQ shall contain a certification by a responsible official in accordance with IDAPA 16.01.01.123. 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.

DATE: February 1, 2001

**PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION**

Monroc, Incorporated
Concrete Batch Plant
Portable

PERMIT NUMBER

7 7 7 - 0 0 1 4 3

SOURCE

Portable Concrete Batch Plant

B. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN NOT COLLOCATED

The Permittee shall comply with the conditions in Section A of this permit and the following permit conditions when the concrete batching facility is operated in any attainment or unclassifiable areas, and when it is not collocated, within the state of Idaho.

B.1 OPERATING REQUIREMENTS**B.1.1 Facility Throughput Limits**

The production rate of the concrete batching facility shall not exceed a maximum of two million six hundred twenty eight thousand cubic yards per any consecutive 12-month period (2,628,000 cy/yr) when operating in any attainment or unclassifiable area.

B.1.2 Collocation Requirements

When the concrete batching facility is to be collocated with another portable concrete batch plant, rock crushing plant, or hot-mix asphalt plant; the collocation requirements of Section C of this permit must be complied with.

DATE: February 1, 2001

**PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION**

Monroc, Incorporated
Concrete Batch Plant
Portable

PERMIT NUMBER

7 7 7 - 0 0 1 4 3

SOURCE

Portable Concrete Batch Plant

C. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS WHEN COLLOCATED

The Permittee shall comply with the conditions in Section A of this permit and the following permit conditions when the concrete batching facility is to be collocated with another portable concrete batch plant, rock crushing plant, or hot-mix asphalt plant within the state of Idaho. The concrete batching facility may only collocate with either one (1) portable rock crushing plant, one (1) portable hot-mix asphalt plant, or one (1) other portable concrete batch plant which has been permitted to specifically allow collocation.

C.1 OPERATING REQUIREMENTS

C.1.1 Collocation Areas

The concrete batching facility may collocate in attainment or unclassifiable areas only. The Permittee shall not collocate in a nonattainment area or proposed nonattainment area without obtaining a Permit which specifically allows for collocation in a nonattainment area.

C.1.2 Number of Portable Sources

The concrete batching facility may only collocate with either one (1) portable rock crushing plant, one (1) portable hot-mix asphalt plant, or one (1) other portable concrete batch plant which has been permitted to specifically allow collocation.

C.1.3 Facility Throughput Limits

The production rate of the concrete batching facility shall not exceed a maximum of one million three hundred fourteen thousand cubic yards per any consecutive 12-month period (1,314,000 cy/yr) when collocated with another concrete batch plant, rock crushing plant, or hot-mix asphalt plant.

DATE: February 1, 2001

**PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION**

Monroc, Incorporated
Concrete Batch Plant
Portable

PERMIT NUMBER

7 7 7 - 0 0 1 4 3

SOURCE

Portable Concrete Batch Plant

D. NONATTAINMENT AREA REQUIREMENTS

The Permittee shall comply with the conditions in Section A of this permit and the following permit conditions when the concrete batching facility is operated in any PM-10 nonattainment areas within the state of Idaho. While operating the concrete batching facility under the conditions set forth in Section D, the concrete batching facility may not collocate with any other facility.

D.1 OPERATING REQUIREMENTS

D.1.1 Facility Throughput Limits

The production rate of the concrete batching facility shall not exceed a maximum of five thousand sixteen cubic yards per day (5,016 cy/day). In addition, the production rate of the concrete batching facility shall not exceed a maximum of one million eight hundred thirty thousand eight hundred fifty-nine cubic yards per any consecutive 12-month period (1,830,859 cy/yr) when operating in any PM-10 nonattainment area or proposed PM-10 nonattainment area.

D.1.2 Collocation Requirements

The concrete batching facility shall not be collocated with another portable concrete batch plant, rock crushing plant, or hot-mix asphalt plant when located in any PM-10 nonattainment area or proposed PM-10 nonattainment area.

DATE: February 1, 2001

PERMIT TO CONSTRUCT GENERAL PROVISIONS

- A. 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 emission 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.
- B. 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.
- C. The Permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
1. To enter at reasonable times upon the premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 2. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack emission testing in conformance with IDAPA 16.01.01.157 when deemed appropriate by the Director.
- D. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- E. The Permittee shall notify DEQ, in writing, of the required information for the following events within five (5) working days after occurrence:
1. Initiation of Construction - Date
 2. Completion/Cessation of Construction - Date
 3. Actual Production Start-up - Date
 4. Initial Date of Achieving Maximum Production Rate - Production Rate and Date
- F. If emission testing is specified, the Permittee must schedule such testing within sixty (60) days after achieving the maximum production rate, but not later than one hundred and eighty (180) days after initial startup. Such testing must **strictly** adhere to the procedures outlined in IDAPA 16.01.01.157 and shall not be conducted on weekends or state holidays without prior written DEQ approval. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least fifteen (15) days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to DEQ upon request.
- The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by DEQ, unless (1) the test demonstrates noncompliance, (2) a more restrictive operating limit is specified elsewhere in this permit, or (3) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.
- G. 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.

DATE: February 1, 2001