



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

April 7, 2009

Certified Mail No. 71900596001100000818

James Walters, Plant Manager
Walters Ready Mix, Inc.
P. O. Box 390
Rexburg, ID 83440

RE: Facility ID No. 777-00450, Walters Ready Mix, Inc., Rexburg
Final Permit Letter

Dear Mr. Walters:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2009.0015 to Walters Ready Mix for the concrete batch plant initially located at Driggs in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on February 9, 2009. This permit does not release Walters Ready Mix, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Idaho Falls Regional Office, 900 N. Skyline, Suite B, Idaho Falls, ID, 83402, Fax (208) 528-2605.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Maria Miles, Air quality Analyst, at (208) 528-2650 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends 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.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior

Walters Ready Mix, Inc., Driggs
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373-0477 or carole.zundel@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\CZ\hp

Project No. P-2009.0015

Enclosures



**Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality**

PERMIT No.: P-2009.0015
FACILITY ID No.: 777-00450
AQCR: Portable CLASS: B ZONE: Portable
SIC: 3273 NAICS: 327320
UTM COORDINATE (km): Portable

1. PERMITTEE

Walters Ready Mix, Inc.

2. PROJECT

Initial permit to construct, portable concrete batch plant

3. MAILING ADDRESS

P. O. Box 390

CITY

Rexburg

STATE

ID

ZIP

83440

4. FACILITY CONTACT

James Walters

TITLE

Plant manager

TELEPHONE

(208) 354-3491

5. RESPONSIBLE OFFICIAL

David Walters

TITLE

President

TELEPHONE

(208) 356-5491

6. EXACT PLANT LOCATION

Initial location: 68 W. 250 S., Driggs

COUNTY

Initial location: Teton

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Concrete production and sales

8. PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and 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.

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 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.

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 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.

Carole Zundel

CAROLE ZUNDEL, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

Mike Simon

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:

DATE ISSUED:

April 7, 2009

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
cy/day	cubic yards per calendar day
cy/hr	cubic yards per hour
cy/yr	cubic yards per year
DEQ	Department of Environmental Quality
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
O&M	Operations and Maintenance
PERF	Portable Equipment Relocation Form
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2009.0015

Permittee:	Walters Ready Mix, Inc.	Facility ID No. 777-00450
Location:	Portable	

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This permit to construct (PTC) is for a concrete batch plant.
- 1.2 This is the initial PTC for the facility

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control
2	<u>Concrete Batch Plant – Ready Mix</u> Manufacturer: Con-e-co Model: LO pro model 12 Maximum capacity: 130 cy/hr Maximum production: 1,040 cy/day and 100,000 cy/yr	<u>Cement Storage Silo Baghouse No. 1:</u> Manufacturer: Con-e-co Model: PJC-300S <u>Cement Storage Silo Baghouse No. 2:</u> Manufacturer: McNeilus Model: SFV 170 <u>Cement Supplement Storage Silo Baghouse No. 1:</u> Manufacturer: Stephens Model: SOS 1020 <u>Weigh Batcher Baghouse:</u> Manufacturer: Con-e-co Model: PJ 9800 <u>Truck Loadout Boot, Enclosure, or Equivalent</u> <u>Material Transfer Point Water Sprays or Equivalent</u>

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Location: Portable

Facility ID No. 777-00450

2. CONCRETE BATCH PLANT

2.1 Process Description

The facility is a portable truck mix concrete batch plant consisting of aggregate storage bins and stockpiles, a cement storage silo, a cement supplement (flyash) storage silo, a weigh batcher, and conveyors. The facility combines sand, gravel, flyash, and cement and transfers the mixture into a truck along with a measured amount of water for in-transit mixing of the concrete. Electric power will be supplied to the facility from the local power grid.

2.2 Emissions Control Description

Table 2.1 CONCRETE BATCH PLANT DESCRIPTION

Emissions Unit / Process	Emissions Control Device
Cement Storage Silo	Baghouse
Cement Supplement Storage Silo	Baghouse
Weigh Batcher	Baghouse
Truck Loading	Boot, Enclosure, or Equivalent
Materials Transfer (Fugitives)	Water Sprays or Equivalent

Emissions Limits

2.3 Opacity Limit

Emissions from any baghouse stack or 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 in IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.4 Concrete Production Limits

The concrete production rate shall not exceed 1,040 cubic yards per day (cy/day), and shall not exceed 100,000 cubic yards in any consecutive 12-calendar month period (cy/yr).

2.5 Setback Requirement

The minimum setback distance at the facility shall be 131 feet. The minimum setback shall be defined as the minimum distance from the nearest edge of any emissions source to any area outside of a building where the general public has access.

2.6 Operations and Maintenance Manual

Within 60 days of permit issuance, the permittee shall have developed an Operations and Maintenance (O&M) manual for the baghouses, transfer point boots/enclosures, and the transfer point water sprays. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouses. The manual shall contain, at a minimum, requirements for monthly inspections of the baghouses during each month of operation. The inspections shall include, but not be limited to, checking that the bags have structural integrity, are appropriately secured in place, and are not plugged. The manual shall contain procedures for inspecting and maintaining transfer point boots/enclosures and for operating water sprays (or equivalent control method) to ensure that fugitive dust emissions from transfer points are reasonably controlled. The

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manual shall remain at the concrete batch plant at all times and shall be made available to DEQ representatives upon request.

2.7 Emissions Control Operating Requirement

The permittee shall operate the baghouses and the water sprays (or equivalent control method) in accordance with the O&M manual.

2.8 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter 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 PM. 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, 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.

Monitoring and Recordkeeping Requirements

2.9 Concrete Production Monitoring

The permittee shall monitor and record the daily (when the concrete batch plant is operated that day), monthly (when the concrete batch plant is operated that month), and annual concrete production to demonstrate compliance with Permit Condition 2.4. Annual production shall be determined by summing each monthly production total over the previous consecutive 12-month period.

2.10 Setback Monitoring

The permittee shall physically measure and record the minimum setback distance:

- Each time the concrete batch plant is relocated,
- Any time the facility layout is changed in such a way that the minimum setback distance is reduced compared to previous operations at that location.

Information recorded shall include, but not be limited to, a brief description of the nearest distance to any area where the general public has access, and the minimum setback distance in meters or feet to an accuracy of plus or minus 1.8 meters (6 feet).

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2.11 Visible Emissions/Opacity Monitoring

Each month that the facility is operated, the permittee shall conduct a facility-wide inspection of potential sources of visible emissions, including all baghouse stacks, 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.

2.12 Fugitive Dust Monitoring

Each day that the facility is operated, the permittee shall conduct a 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.

Each time fugitive dust emissions trigger correction of a dust control strategy or implementation of additional dust control strategies, the permittee shall monitor and record the trigger, the corrective action used, and the results achieved from the use of that control strategy or strategies.

PM10 Nonattainment Areas

2.13 PM₁₀ Nonattainment Area Operations

Under this permit, the permittee shall not relocate and operate this concrete batch plant in any PM₁₀ nonattainment area. These areas currently include the Pinehurst and Sandpoint PM₁₀ nonattainment areas. Contact DEQ for current nonattainment area status and more specific details about the nonattainment area boundaries. Should the permittee desire to operate in any PM₁₀ nonattainment area, the permittee shall submit a PTC application to modify this permit.

Collocation

2.14 Collocated Operations

2.14.1 Under this permit, this concrete batch plant may not collocate with any other source of emissions, including another portable rock-crushing plant, portable hot-mix asphalt plant, portable concrete batch plant, or electrical generator set.

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2.14.2 This concrete batch plant shall be considered to be collocated if the nearest distance between any emissions point associated with another source of emissions, and any stockpile, silo, weigh batcher, transfer point, conveyor, or other emission point associated with this concrete batch plant is less than 200 meters (656 feet).

Reporting Requirements

2.15 Relocation

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 Relocation Form (PERF) in accordance with IDAPA 58.01.01.500, to the following address or fax number:

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

Phone: (208) 373-0502
Fax: (208) 373-0340

The scaled plot plan shall show the location of any emissions source associated with the concrete batch plant, and distances to any area outside of a building where the general public has access, including property boundaries.

Electronic copies of the PERF may be obtained from DEQ's website in both pdf and Word® versions at:

http://www.deq.idaho.gov/air/permits_forms/forms/ptc_relocation.pdf, or
http://www.deq.idaho.gov/air/permits_forms/forms/ptc_relocation.doc

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3. PERMIT TO CONSTRUCT 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;
 - 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;

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- 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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Permittee: Walters Ready Mix, Inc.

Location: Portable

Facility ID No. 777-00450

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)]