



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
Curt Fransen, Director

May 28, 2015

Spencer Jones, Plant Manager
Oldcastle Precast, Inc.
16419 Ten Lane
Nampa, ID 83687

RE: Facility ID No. 027-00085, Oldcastle Precast Inc., Nampa
Final Permit Letter

Dear Mr. Jones:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2015.0012 Project 61488 to Oldcastle Precast Inc. located at Nampa for renewing the PTC/Tier II operating permit and for converting it to a PTC. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received March 6, 2015.

This permit is effective immediately and replaces PTC/Tier II No. T2-2008.0051 issued August 29, 2008. This permit does not release Oldcastle Precast Inc. 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 Tom Krinke, AQ Compliance Officer, at (208) 373-0419 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.

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 to filing a petition for a contested case, I encourage you to contact Shawnee Chen at (208) 373-0502 or Shawnee.chen@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon". The signature is written in a cursive, flowing style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\SYC

Permit No. P-2015.0012 PROJ 61488

Enclosures

Air Quality PERMIT TO CONSTRUCT

Permittee Oldcastle Precast, Inc.
Permit Number P-2015.0012
Project ID 61488
Facility ID 027-00085
Facility Location 16419 Ten Lane
Nampa, ID 83687

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 May 28, 2015



Shawnee Chen, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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List of Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
Btu	British thermal unit
CO	carbon monoxide
COMS	continuous opacity monitoring system
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MMBtu	million British thermal units
MMBtu/hr	million British thermal units per hour
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
O&M	Operations and Maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PTC/Tier II	Permit to Construct and Tier II Operating Permit
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
SO _x	sulfur oxides
Tier II	Tier II operating permit
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound
yd ³	cubic yard

1. PERMIT SCOPE

Purpose

- 1.1 This is a revised permit to construct (PTC) for renewing the PTC/Tier II operating permit and for converting it to a PTC. [5/28/2015]
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin. [5/28/2015]
- 1.3 This PTC replaces PTC/Tier II No. T2-2008.0051, issued on August 29, 2008. [5/28/2015]

Regulated Sources

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
3	Cleaver Brooks Model CB 700.150, 6.28 MMBtu/hr natural gas-fired boiler	None
4	Cement storage silo loading	Baghouse
	Fly ash storage silo loading	Baghouse

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 dusts; and
 - Paving of roadways and their maintenance in a clean condition, 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 quarterly 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.
- 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, at a minimum, include 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_x, 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 quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. 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:
- a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).
- or
- b) 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%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.
- [5/28/2015]
- 2.9 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 were present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[5/28/2015]

Open Burning

- 2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-624, Rules for Control of Open Burning.

Reports and Certifications

- 2.11 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 shall be submitted to the following address:

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

Obligation to Comply

- 2.12** Receiving a PTC shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

3. CLEAVER BROOKS 6.28 MM BTU/HR NATURAL GAS-FIRED BOILER

3.1 Process Description

The primary purpose of the Cleaver Brooks boiler is to provide process steam for product curing and space heating.

3.2 Emission Control Description

Emissions from this boiler are uncontrolled.

Emission Limits

3.3 Particulate Matter Emission

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, as required by IDAPA 58.01.01.677.

3.4 Emission Limits

The emissions from the Cleaver Brooks boiler stack shall not exceed any corresponding emissions rate limits listed in Table 3.1.

Table 3.1 EMISSION LIMITS^a – HOURLY (LB/HR), AND ANNUAL^b (T/yr)

Source Description	PM ₁₀		NO _x		CO		VOC		SO ₂	
	lb/hr ^c	T/yr ^c	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
6.28 MMBtu/hr natural gas-fired boiler ^{d,e}	0.05	0.2	0.62	2.7	0.52	2.27	0.03	0.15	0.004	0.02

^aAs 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.

^bAs 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.

^cIncludes condensibles

^dNatural gas boiler emissions determined using emission factors in AP-42.

^eIn absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.

Operating Requirements

3.5 Fuel Type

The permittee shall combust natural gas exclusively in the Cleaver Brooks boiler.

Monitoring and Recordkeeping Requirements

3.6 Fuel Monitoring

The permittee shall monitor and record the amount of natural gas burned in the Cleaver Brooks boiler once a month to demonstrate compliance with Permit Conditions 3.3, 3.4, and 3.5. Records of the fuel usage shall be kept on site in accordance with General Provision 5.10 monitoring and recordkeeping requirements.

4. CEMENT AND FLY ASH SILOS

4.1 Process Description

Cement and fly ash are pneumatically transferred from a delivery truck to separate storage silos. Only one silo can be loaded at a time. Cement, fly ash, aggregate, and sand are transferred into a weigh hopper and then into the cement mixing equipment. The entire precast product manufacturing process is conducted inside a building.

4.2 Emission Control Description

Particulate matter emissions resulting from cement silo loading and fly ash silo loading are controlled by two separate baghouses. Fugitive dust from aggregate and sand transfer points, material transfer to the weigh hopper, and material transfer to the concrete mixing equipment is controlled by being confined in the mixing building.

Table 4.1 CEMENT SILO BAGHOUSE AND FLY ASH SILO BAGHOUSE

Emissions Unit / Process	Emissions Control Device
Cement storage silo loading	Baghouse
Fly ash storage silo loading	Baghouse

Emission Limits

4.3 Emission Limits

The PM₁₀ emissions from the cement storage silo baghouse and the fly ash silo baghouse vent shall not exceed any corresponding emissions rate limits listed in Table 4.2.

Table 4.2 BAGHOUSE EMISSIONS LIMITS ^c

Source Description	PM ₁₀	
	lb/hr ^a	T/yr ^b
Cement storage silo baghouse	0.12	0.023
Fly Ash storage silo baghouse	0.34	0.06

^a Based on the unloading rate of cement and fly ash into the silos.

^b Based on the amount of cement and fly ash need to product yearly limit of concrete in Permit Condition 4.5.

^c In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.

4.4 Opacity Limit – Baghouse Vents and Other Point Sources

Visible emissions from each baghouse vent, stack, or other functionally equivalent opening shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period. Opacity shall be determined by the procedure contained in IDAPA 58.01.01.625.

Operating Requirements

4.5 Production Limits

4.5.1 The concrete production rate shall not exceed 1,392 yd³ per calendar day.

4.5.2 The concrete production rate shall not exceed 508,080 yd³ per any consecutive 12-month period.

4.6 Weigh Hopper and Concrete Mixing Operations

The sand and aggregate transfer from the elevator bins to the weigh hopper above the concrete mixer shall be conducted in a building. The cement and fly ash transfer to the weigh hopper above the concrete mixer shall be conducted in a building.

4.7 Cement Silo Loading and Fly Ash Silo Loading

Particulate matter emissions resulting from cement silo loading and fly ash silo loading shall be controlled by the cement storage silo baghouse and the fly ash silo baghouse, respectively.

4.8 Pressure Drop Measuring Device

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure drop across the cement storage silo baghouse and fly ash storage silo baghouse.

4.9 Baghouse Pressure Drop

The pressure drop across the cement storage silo baghouse and fly ash storage silo baghouse shall be maintained within each baghouse manufacturer's and Operations and Maintenance (O&M) manual's recommended pressure drop operating ranges. Documentation of the manufacturer recommended pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

4.10 Monitoring Operating Parameters

The permittee shall monitor and record the following operating parameters. These records shall remain onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.

- The concrete production rate shall be monitored and recorded daily and annually to demonstrate compliance with Permit Condition 4.5.
- The pressure drop across the cement storage silo baghouse and fly ash storage silo baghouse shall be recorded once each time cement and fly ash are loaded into their silos to demonstrate compliance with Permit Conditions 4.7, 4.8, and 4.9.

4.11 Visible Emissions Monitoring

The permittee shall conduct visible emissions inspection in accordance with Permit Condition 2.8 but at a frequency of each time when cement and/or fly ash are loaded into their silos.

[5/28/2015]

4.12 Operations and Maintenance Manual Requirements

The permittee shall have developed and have maintained onsite an O&M manual developed using each baghouse manufacturer's recommended operating specifications. The O&M manual shall contain, at a minimum, the following information: the baghouse manufacturer's recommended pressure drop operating range for cement and fly ash PM₁₀ control; the manufacturer's guaranteed PM₁₀ collection efficiency, or the manufacturer's guaranteed grain loading; the airflow through each baghouse, in acfm, induced by the fan; a general description of each baghouse; the normal operation, maintenance, and repair of each baghouse; and the methods of preventing malfunctions and the appropriate corrective actions to be taken in the event of a malfunctions. The O&M manual shall be made available to DEQ representatives upon request.

5. GENERAL PROVISIONS

General Compliance

5.1 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.]

5.2 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]

5.3 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

5.4 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

5.5 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]

5.6 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

- 5.7 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.
- 5.8 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.
- 5.9 Within 30 days, or up to 60 days when requested 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

- 5.10 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

5.11 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

5.12 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

5.13 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

5.14 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

5.15 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

5.16 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]