



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Curt Fransen, Director

February 28, 2013

C. Michael Horrocks, Owner
American Falls Ready Mix
9659 N. Philbin Rd.
Pocatello, ID 83202

RE: Facility ID No. 077-00034, American Falls Ready Mix, American Falls
Final Permit Letter

Dear Mr. Horrocks:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2013.0003 Project 61145 to American Falls Ready Mix located at American Falls for a Concrete Batch Plant General Permit. 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 January 17, 2013.

This permit is effective immediately. This permit does not release American Falls Ready Mix from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to:

Idaho Department of Environmental Quality
Pocatello Regional Office.
444 Hospital Way #300,
Pocatello, ID 83201,
Fax (208) 236-6168.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Rick Elkins, Air Quality Analyst, at (208) 236-6160 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 Darrin Pampaian at (208) 373-0502 or darrin.pampaian@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 large, sweeping initial "M".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\dp

Permit No. P-2013.0003 PROJ 61145

Enclosures

Air Quality
PERMIT TO CONSTRUCT

Permittee American Falls Ready Mix
Permit Number P-2013.0003
Project ID 61145
Facility ID 077-00034
Facility Location 3223 Whitnah Rd., American Falls, Idaho

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 February 28, 2013



Darrin Pampaian, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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PERMIT TO CONSTRUCT SCOPE

Purpose

1. This permitting action is for issuing a General Concrete Batch Plant.
2. The emission sources regulated by this permit are listed in the following table.

Table 1 REGULATED SOURCES

Source Descriptions	Emission Controls
<p><u>Concrete Batch Plant – Truck Mix</u> Manufacturer: Belgrade Steel Tank Co., Inc. Model: 12 Yd Accumulative Maximum capacity: 100 cy/hr Maximum production: 500 cy/day</p>	<p><u>Cement Storage Silo Baghouse No. 1^b:</u> Manufacturer: Belgrade Steel Tank Co., Inc. Model: 225 sq. ft. Dust Collector 18 bags, 6' x 0.67' baghouse</p> <p><u>Cement Supplement Storage Silo Flyash Baghouse No. 2^a:</u> Manufacturer: Belgrade Steel Tank Co., Inc. Model: 225 sq. ft. Dust Collector 18 bags, 6' x 0.67' baghouse</p> <p><u>Weigh Batcher Baghouse:</u> Manufacturer: Belgrade Steel Tank Co., Inc. Model: 16 sq. ft. Dust Vent 4 bags, 2' x 0.67' baghouse</p> <p><u>Load-out Shroud:</u> Boot or shroud</p> <p><u>Material Transfer Point Water Sprays or Equivalent</u> Best Management Practices Sprays and other suppressants</p>

- a. Both the storage silo baghouse and supplement storage silo flyash baghouse are considered process equipment. Therefore, there is no associated control efficiency. PM₁₀ controlled emission factors were used when determining PTE and for modeling purposes.

FACILITY WIDE CONDITIONS

Fugitive Dust Control

3. Reasonable Control of Fugitive Dust Emissions

The permittee shall control fugitive emissions generated by operations associated with the CBP plant to ensure that visible fugitive emissions do not extend beyond the facility property boundary. Visible fugitive emissions shall be determined using see/no see observations.

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.

4. Fugitive Dust Control – Best Management Practices

The permittee shall immediately implement a strategy or strategies to control fugitive dust emissions whenever:

- Visible fugitive emissions generated by activities associated with this CBP plant are observed leaving the facility boundary.
- Visible emissions shall be determined on a see/no see basis.

For the purpose of the following conditions, if any visible fugitive emissions are present at the property boundary from these sources described below, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 visible emissions (VE) test.

- Visible fugitive emissions are greater than 20% from any transfer point. For the purposes of this permit condition, transfer points include, but are not limited to, the following: transfer of sand and aggregate to respective weight bins/hoppers or storage bins/hoppers; transfer of sand and aggregate from respective weight bins/hoppers or storage bins/hoppers to a conveyor; transfer of sand and aggregate from a conveyor to the mixer; and transfer of cement and cement supplement from the storage silo to the mixer.
- Transfer point control strategies for this facility shall include providing manual water spray capability or installing, operating, and maintaining industry specific water spray bars at transfer points, and may also include limiting drop heights such that there is a homogeneous flow of material.

- Visible fugitive emissions from wind erosion on stockpiles exceed 20% opacity for a period or periods aggregating more than one minute in any 60-minute period. Reasonable stockpile wind erosion control strategies for this facility include, but are not limited to, limiting the height of the stockpiles, limiting the disturbance of stockpiles or covering the stockpiles during windy conditions, enclosing the piles in a 3-sided bunker or storage bin, and application of water or a chemical dust suppressant onto the surface of the stockpile.
- Visible fugitive emissions from vehicle traffic on any paved or unpaved roads within the facility boundary exceed 20% opacity for a period or periods aggregating more than one minute in any 60-minute period.
- Reasonable control strategies for this facility include but are not limited to limiting vehicle traffic, limiting vehicle speed, application of water or a chemical dust suppressant to the surface of the road, application of gravel to the surface of unpaved roads, sweeping or water sprays to clean the surface of a paved road, and grates, water washes, or other suitable methods to prevent track-out onto paved roads.

Fugitive Dust Control Monitoring and Recordkeeping

5. Fugitive Dust Monitoring

Each day that the facility is operated, the permittee shall conduct a facility-wide inspection of potential sources of fugitive emissions (e.g., stockpiles, transfer points, etc.) 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), hours of operation (start & stop) of water, or chemical dust suppressant, application systems, hours of operation of each material handling equipment, certification of data recordkeeping in accordance with general provisions and 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.

Opacity

6. 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.

Visible Emissions Monitoring and Recordkeeping

7. Visible Emission/Opacity Monitoring

Each month that the facility is operated, the permittee shall conduct a facility-wide inspection of potential sources of visible emissions (e.g., baghouses, stack equipment, generator exhaust stacks etc.) 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:

- 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. The Method 9 test shall be performed by a certified observer. 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 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.

Odors

8. Odors

In accordance with IDAPA 58.01.01.776.01, the permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution.

9. Odor Complaints

The permittee shall maintain records of all odor complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a complaint. The records shall include, at a minimum, the date 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.

Nonattainment Areas

10. Nonattainment Area Operations

The permittee shall not relocate and operate any equipment in any nonattainment area. Contact DEQ for current nonattainment area status and more specific details about the nonattainment area boundaries. The geographical locations of nonattainment area in Idaho may be found online at the DEQ website.

Co-location

11. Co-location Operations

The emissions sources listed for this CBP shall not collocate with more than one rock crushing plant and shall not locate within 1,000 feet (305 meters) of any other asphalt plant or concrete batch plant.

CONCRETE BATCH PLANT

Process Description

12. American Falls Ready Mix is a truck mix concrete batch plant that may consist of the following: aggregate stockpiles, a cement storage silo, a cement supplement (flyash) storage silo, a weigh batcher, conveyors and an electric power supply. The facility combines aggregate, flyash and cement, and transfers the mixture into a truck along with a measured amount of water for in-transit mixing of the concrete. Electrical power will be supplied to the facility by the local power grid. Also, water heater(s) may be used to heat the water in cold weather prior to use for the mixing of concrete.

13. **Emission Controls Description**

Table 2 CONCRETE BATCH PLANT DESCRIPTION

Emissions Units / Processes	Emission Control Devices
Cement Storage Silo	None ^a
Cement Supplement Storage Silo Flyash	None ^a
Weigh Batcher	Water spray bar around feed boot
Truck Loading	Boot or shroud
Material Transfer (Fugitives)	Industry Specific Water sprays or equivalent/No visible emissions across property line

a. The baghouses are considered process equipment.

Operating Requirements

14. **Concrete Production Limits**

The concrete production rate shall not exceed the limits set forth in the following table in any one (1) day (cy/day) or consecutive 12-calendar month period (cy/yr). The maximum production limit shall be defined by the setback distance available at a given location.

Table 3 MAXIMUM PRODUCTION RATE

Maximum Concrete Production cy/day	500
Maximum Annual Production cy/yr	100,000

15. **Installation of Baghouse Filter/Cartridge System**

The permittee shall install, operate and maintain, at all times, baghouses in accordance with the developed procedures document required in this permit to control PM, PM_{2.5} and PM₁₀ emissions from the concrete batch plant.

16. **Installation of Water Spray Bar**

The permittee shall install, operate and maintain, at all times, industry specific water sprays (or equivalent) in accordance with the developed procedures document required in this permit to control PM, PM_{2.5} and PM₁₀ emissions from the concrete batch plant.

17. **Control System Procedures**

Within 60 days of initial start-up, the permittee shall have developed a Control System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from the baghouses, transfer point boots/enclosures, and the transfer point water sprays. The Control System Procedures document shall be a permittee developed document independent of the manufacturer-supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Control System Procedures document shall describe the procedures that will be followed to comply with the maintenance General Provision and shall contain requirements for weekly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Control System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at anytime. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.
- Air to Cloth Ratio Certification

The Control System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the material transfer points at anytime. At a minimum the document shall include:

- Procedures to determine if spray bar is functioning properly; and
- Procedures to determine if water spray bar is appropriate for the application and secured in place.

The Control System Procedures document shall also include, at a minimum, the following methodology used by the facility to handle fugitive dust emissions:

- Use, where practical, of water, or chemical dust suppressant, for control of dust generated as a result of material handling or processing;
- Application of water, or chemical dust suppressant, by hardpiped, conical deluge, or mist, application systems, or equivalent;
- Application and use, where practical and as specified in the application materials, of shrouding of material transfer points;
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Containment methods shall be employed during mixing or drop operations;

The permittee shall maintain records of the results of each control system inspections in accordance with Recordkeeping General Provision. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The Control System Procedures document shall be submitted to DEQ within 60 days of permit issuance to remain on file and shall contain a certification by a responsible official. A copy shall also remain on site. Any permittee or DEQ requested changes to the Control System Procedures document shall be submitted within 15 days of the change.

Air Quality Permit Compliance
Department of Environmental Quality
Pocatello Regional Office
444 Hospital Way #300
Pocatello, ID 83201

The Control System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the Control System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

18. **Truck Loadout Emissions Control**

To assure 95% control truck loadout emissions, a shroud/boot enclosure shall be installed, maintained and used at all times during loadout procedures.

Monitoring and Recordkeeping Requirements

19. **Concrete Production Monitoring**

When operating, the permittee shall monitor and record the daily, monthly, and annual concrete production to demonstrate compliance with the concrete production permit condition. Annual production shall be determined by summing each monthly production total over the previous consecutive 12-month period.

PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

20. 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.]**
21. 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]**
22. 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

23. 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 or 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

24. 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]**
25. The permittee shall furnish EPA written notifications as follows in accordance with IDAPA 58.01.01.211:
- 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;
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

26. 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.
27. 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.
28. 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

29. 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]

Excess Emissions

30. 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

31. 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

32. 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

33. 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

34. 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

35. 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)]