



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR
TONI HARDESTY, DIRECTOR

July 21, 2006

Certified Mail No. 7005 1160 0000 1550 6261

Mr. David Walters, President
Walters Ready Mix, Inc.
P. O. Box 390
Rexburg, ID 83440

RE: Facility ID No. 777-00381, Walters Ready Mix, Inc., Rexburg,
Portable Concrete Batch Plant, Final Permit to Construct No. P-060507

Dear Mr. Walters:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-060507 for Walters Ready Mix, Inc. portable concrete batch plant currently located at 244 South, 50 West, approximately 2-1/2 miles south of Driggs, Idaho. This permit is issued 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 March 23, 2006, and additional information received on June 26, 2006. This permit is effective immediately. This permit does not release the permittee from compliance with all other applicable federal, state, local, or tribal laws, regulations, or ordinances.

A representative of DEQ's Idaho Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations 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 Dan Pitman at (208) 373-0502 or Daniel.Pitman@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/CR/bf

Permit No. P-060507

Enclosure

c: **Rensay Owen, Idaho Falls Regional Office**
 Dan Pitman, Permit Coordinator, AQ Division
 Cheryl Robinson, Permit Writer, AQ Division
 Pat Rayne, AFS
 Marilyn Seymore, PB
 Laurie Kral, Region 10 EPA
 Permit Binder
 Source File
 Phyllis Heitman (Ltr Only)
 Reading File (Ltr Only)



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

PERMIT NO.: P-060507

FACILITY ID No. 777-00381

AQCR: Portable

CLASS: B

SIC: 3273

ZONE: Portable

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 Z. Walters

TITLE

President

TELEPHONE

(208) 356-5491

6. EXACT PLANT LOCATION

Portable. Initial location: 244 South, 50 West, approx. 2-1/2 miles south of Driggs

COUNTY

Portable. Initial Location: Teton

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Concrete Batch Plant

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, 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 of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED:

July 21, 2006

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
cfm	cubic feet per minute
cy	cubic yards
cy/day	cubic yards per day
cy/hr	cubic yards per hour
cy/yr	cubic yards in any consecutive 12-month period
DEQ	Department of Environmental Quality
HMA	hot mix asphalt
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
O&M	operations and maintenance
PERF	Portable Equipment Registration and Relocation Form
PM	particulate matter
PM₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
TAPs	toxic air pollutants
UTM	Universal Transverse Mercator
w.g.	water gauge
ZONE	UTM Zone

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060507

Permittee:	Walters Ready Mix, Inc.	Facility ID No. 777-00381	Date Issued:	July 21, 2006
Location:	Portable			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

Walters Ready Mix has requested a PTC to reflect physical changes made to the plant that increased the hourly production capacity from 40 cubic yards of concrete per hour (cy/hr) to 70 cy/hr of concrete.

Regulated Sources

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(s)
2	<u>Portable ready-mix plant</u> Manufacturer: Johnson Model: TY267 Max. hourly throughput: 70 cubic yards of concrete per hour Max. annual throughput: 140,000 cubic yards of concrete	<u>Cement Storage Silo Baghouse:</u> Manufacturer: McNeilus Model: SFV170 <u>Fly Ash Storage Silo #2, Filter Vent:</u> Manufacturer: Stephens Mfg. Co. Model: SOS-1020, (Cartridge type)

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2. CONCRETE BATCH PLANT

2.1 Emissions Control Description

The particulate matter (PM) emissions from the cement storage silo and the cement supplement (fly ash) storage silo are controlled by baghouse/dust collectors described in Table 2.1. The weigh batcher is not equipped with an air pollution control device.

Table 2.1 CONTROL DESCRIPTION OF THE CONCRETE BATCH PLANT

Emissions Unit(s)/Processes	Emissions Control Device	Emissions Point
Cement Storage Silo Baghouse	Manufacturer: McNeilus Model: SFV170	Cement Silo Stack: Stack height: 40 feet Stack opening: 8-inch x 6-inch (0.65 foot equivalent diameter) Exit air flow rate: 650 cfm Capture efficiency: 99.6%
Fly Ash Storage Silo #2, Filter Vent	Manufacturer: Stephens Mfg. Co. Model: SOS-1020, (Cartridge type)	Silo #2 Filter Vent Stack: Stack height: 40 feet Stack opening: 3 feet diameter Exit air flow rate: 28 cfm at 0.5" w.g. pressure difference Capture efficiency: 99.995%

Emissions Limits

2.2 Visible Emissions Limit

Emissions emanating from any stack, vent, 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 as required in IDAPA 58.01.01.625. Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.3 Concrete Production Limit

The concrete production shall not exceed 140,000 cubic yards of concrete in any consecutive 12-month period.

2.4 Operations and Maintenance Manual

Within 60 days of permit issuance, the permittee shall have developed an Operations and Maintenance (O&M) manual for the baghouse and filter vent, which control the PM and PM₁₀ emissions from the silo operations. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouse and vent dust collector. The manual shall contain, at a minimum, requirements for monthly inspections of the baghouse and dust collector during

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each month of operation. The inspections shall include, but not be limited to, checking the bags or cartridges for structural integrity and that they are appropriately secured in place. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

The permittee shall operate the silo baghouse and dust collector in accordance with the O&M manual.

2.5 Fugitive Dust Control Strategies

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

- 2.5.1 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; transfer of cement and cement supplement from the storage silo to the mixer.

Transfer point control strategies include, but are not limited to, the following: limit drop heights such that there is a homogeneous flow of material; and install, operate, and maintain water spray bars to control fugitive dust emissions at transfer points on conveyors.

- 2.5.2 Visible fugitive emissions from wind erosion on stockpiles exceeds 20% opacity for a period or periods aggregating more than one minute in any 60-minute period.

Stockpile wind erosion control strategies include, but are not limited to, the following: limit the height of the stockpiles; limit the disturbance of stockpiles; and apply water or a chemical dust suppressant onto the surface of the stockpile.

- 2.5.3 Visible fugitive emissions from vehicle traffic on any paved or unpaved roads within the facility boundary of the concrete batch plant exceeds 20% opacity for a period or periods aggregating more than one minute in any 60-minute period.

Visible fugitive emissions control strategies for vehicle traffic on paved and unpaved roads within the facility boundary include, but are not limited to, the following: limit vehicle traffic; limit vehicle speed; apply water or a chemical dust suppressant to the surface of the road; apply gravel to the surface of unpaved roads; and sweep or use water sprays to clean the surface of a paved road.

2.6 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.

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- 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

2.7 Concrete Production Monitoring

The permittee shall monitor and record the monthly and annual concrete production to demonstrate compliance with Permit Condition 2.3. Annual production shall be determined by summing each monthly production total over the previous consecutive 12-month period.

2.8 Visible Emissions Monitoring

During any month that the facility is operated, the permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, including the silo baghouse and filter vent 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 its annual compliance certification and 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.

2.9 Reasonable Control Measures

The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly 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.

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PM₁₀ Nonattainment Areas

2.10 PM₁₀ Nonattainment Area Operations

Under this permit, the permittee may relocate and operate this concrete batch plant in any PM₁₀ nonattainment area except the Sandpoint PM₁₀ nonattainment area. Contact DEQ for current nonattainment area status and more specific details about the nonattainment area boundaries.

Collocation

2.11 Collocated Operations

The permittee may collocate this concrete batch plant with any facility anywhere in Idaho except the Sandpoint PM₁₀ nonattainment area.

Reporting Requirements

2.12 Records

Records required in this permit shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

2.13 Relocation

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

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

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

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.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - 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 compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. 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.
5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
 - A notification of the date of initiation of construction, within five working days after occurrence;
 - A notification of the date of completion/cessation of construction, within five working days after occurrence;
 - 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
 - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.
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.

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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.

7. 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.
8. In accordance with IDAPA 58.01.01.123, 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.