STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

James E. Risch, Governor
Toni Hardesty, Director

November 15, 2006

Certified Mail No. 7005 1160 0000 1550 8128

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

RE: Facility ID No. 777-00291, Walters Ready Mix, Inc., Rexburg
Final Permit Letter

Dear Mr. Walters:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-060506 to Walters Ready Mix, Inc. portable concrete batch plant, 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 supplemental information provided on June 30, 2006. This permit is effective immediately, and replaces PTC No. 777-00291, issued on December 10, 2001, the terms and conditions of which no longer apply. This permit does not release Walters Ready Mix, Inc., from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the 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 call Cheryl Robinson at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/CR/bf Permit No. P-060506

Enclosures

G:\Air Quality\Stationary Source\Ss Ltd\Ptc\Walters Ready Mix\P-060505 & P-060506\P-060506\Final\Walters P-060506 777-00291 Idf Pit Final Ltr.Doc

c: Rensay Owen, Idaho Falls Regional Office
Bill Rogers, Permit Coordinator
Cheryl Robinson, Permit Writer
Marilyn Seymore/ Pat Rayne, Air Quality Division
Laurie Kral, US EPA Region 10
Permit Binder
Source File
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)
Mr. James Walters, Plant Manager, Walters Ready Mix, Inc., 244 South 50 West, Driggs, Idaho 83422

Air Quality
PERMIT TO CONSTRUCT

State of Idaho
Department of Environmental Quality

PERMIT No.: P-060506
FACILITY ID No.: 777-00291
AQCR: Portable **CLASS:** B
SIC: 3273 **ZONE:** Portable
UTM COORDINATE (km): Portable

1. PERMITTEE
Walters Ready Mix, Inc.

2. PROJECT
Portable Concrete Batch Plant, allow collocation with Valley Ready Mix in Idaho Falls

3. MAILING ADDRESS	CITY	STATE	ZIP
P.O. Box 390	Rexburg	ID	83440
4. FACILITY CONTACT	**TITLE**	**TELEPHONE**	
James Walters	Plant Manager	(208) 354-3491	
5. RESPONSIBLE OFFICIAL	**TITLE**	**TELEPHONE**	
David Z. Walters	President	(208) 356-5491	
6. EXACT PLANT LOCATION		**COUNTY**	
Portable. Initial Location: 2500 W 65th South, Idaho Falls		Portable. Initial Location: Bonneville	

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.

Bill Rogers for

CHERYL ROBINSON, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

Mike Simon

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: November 15, 2006

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....3

1. PERMIT TO CONSTRUCT SCOPE.....4

2. CONCRETE BATCH PLANT.....5

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS.....10

Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
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
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
kW	kilowatts
O&M	operations and maintenance
PERF	Portable Equipment Registration and 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
ZONE	UTM Zone

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This Permit to Construct (PTC) is a modification to an existing permit, and allows collocation of this portable concrete batch plant with a second Walters Ready Mix, Inc., portable concrete batch plant (Facility ID 777-00290) and the Valley Ready Mix, Inc., concrete batch plant (Facility ID 777-00177) located at 2500 West 65th South in Idaho Falls.

1.2 This PTC replaces PTC No. 777-00291, dated December 14, 2001, the terms and conditions of which no longer apply.

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(s)
2	Concrete Batch Plant – Truck Mix, or equivalent Manufacturer: Vince Hagan Model: HSM 10000 C, Serial # 79020 Maximum production capacity: 60 cubic yards of concrete per hour (cy/hr)	Cement Storage Silo Baghouse, or equivalent: Manufacturer: McNeilus Model: SFV170
2	Electrical Generator, or equivalent Manufacturer: Cummins Model: 4 BT 3.9-62, 4 cycle, in-line 4 cylinder Rating: 50 kW (67 hp) Fuel: Diesel (#2 fuel oil) Max Fuel Use Rate: 5.15 gallons per hour (gal/hr)	None

2. CONCRETE BATCH PLANT

2.1 Process Description

The facility is a portable truck mix concrete batch plant consisting of aggregate storage bin(s), a cement storage silo, weigh batcher, and conveyors. The plant combines sand, gravel, 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 for the portable facility is provided by the local electric utility, where available, and by a 50 kW Cummins diesel electric generator when line power is not available.

2.2 Emissions Control Description

The particulate matter (PM) emissions from the cement storage silo are controlled by a baghouse 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	Cement Silo Stack: Stack height: 30 feet Stack diameter: 4.12 feet Exit air flow rate: 650 cfm Capture Efficiency: 99.6%
Generator	None	Generator Stack: Stack height: 13 ft, 2 inches (13.17 ft) Stack diameter: 3 inches (0.25 ft) Exhaust gas flow rate: 460 acfm standby 420 acfm prime Exhaust gas temperature: 1,010 °F standby 950 °F prime

Emissions Limits

2.3 Visible Emissions Limit

Emissions from the cement storage silo stack, generator stack, or 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

2.4 Concrete Production and Generator Operation Limits

2.4.1 When not collocated, and operating in an attainment or unclassified area, the concrete production rate shall not exceed 525,600 cubic yards in any consecutive 12-month period.

2.4.2 When not collocated, and operating in a PM_{10} nonattainment area (excluding the Sandpoint PM_{10} nonattainment area) or any proposed PM_{10} nonattainment area:

2.4.2.1 The concrete production rate shall not exceed 239,592 cubic yards in any consecutive 12-month period, and

2.4.2.2 The generator operations shall not exceed 3,993 hours in any consecutive 12-month period.

2.4.3 When collocated with another concrete batch plant, rock-crusher, or hot-mix asphalt plant in an attainment or unclassified area:

2.4.3.1 The concrete production rate shall not exceed 262,800 cubic yards of concrete in any consecutive 12-month period, and

2.4.3.2 The generator operations shall not exceed 4,380 hours in any consecutive 12-month period.

2.4.4 When collocated with any other facility at the Valley Ready Mix, Inc., concrete batching plant at 2500 West 65th South in Idaho Falls (Facility ID 777-00177):

2.4.4.1 The concrete production rate shall not exceed 960 cubic yards of concrete per day, and 10,000 cubic yards of concrete in any consecutive 12-month period, and

2.4.4.2 The generator operations shall not exceed 16 hours per day and 2,000 hours in any consecutive 12-month period.

2.5 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, which controls the PM and PM_{10} 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. The manual shall contain, at a minimum, requirements for monthly inspections of the baghouse during each month of operation. The inspections shall include, but not be limited to, checking the bags for structural integrity and that they are appropriately secured in place, and they are not plugged. 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 in accordance with the O&M manual.

2.6 Fugitive Dust Control Strategies

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

2.6.1 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.

2.6.2 Visible fugitive emissions from wind erosion on stockpiles exceeds 20% opacity for a period or periods aggregating more that 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.

2.6.3 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.

2.7 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

2.8 Concrete Production Monitoring

The permittee shall monitor and record the daily (when the facility is operated that day), monthly, 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.

2.9 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 generator 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.

2.10 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.

PM_{10} Nonattainment Areas

2.11 PM_{10} Nonattaiment Area Operations

Under this permit, the permittee may relocate and operate this concrete batch plant in any PM_{10} nonattainment area except the Sandpoint PM_{10} nonattainment area. Contact DEQ for current nonattainment area status and more specific details about the nonattainment area boundaries.

Collocation

2.12 Collocated Operations

2.12.1 The concrete-batching facility may collocate in attainment or unclassifiable areas only. The permittee shall not collocate in a nonattainment area or proposed nonattainment area without first obtaining a permit which specifically allows for collocation in a nonattainment area.

2.12.2 The permittee may collocate this concrete batch plant with either one portable rock-crushing plant, on portable hot-mix asphalt plant, or one other portable concrete batch plant, which has been permitted to specifically allow collocation.

2.12.3 The permittee may collocate this concrete batch plant with the Valley Ready Mix, Inc., concrete batch plant (Facility ID 777-00177) located at 2500 West 65th South in Idaho Falls, and with:

- A second Walters Ready Mix, Inc., portable concrete batch plant (Facility ID 777-00290), or
- Any other concrete batch plant that is permitted to collocate with Valley Ready Mix (Facility ID 777-00177) and one other concrete batch plant.

Reporting Requirements

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

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;

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]

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.