



Air Quality Permitting Response to Public Comments

September 26, 2017

Permit to Construct No. P-2017.0036

Project No. 61906

**Dahle's Red-E-Mix
Salmon, Idaho**

Facility ID No. 059-00004

A handwritten signature in black ink, appearing to be "R. Pope", is positioned to the left of the typed name.

Prepared by:
Rakaël Pope, Permit Writer
AIR QUALITY DIVISION

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct for Dahle's Red-E-Mix from August 8, 2017, through September 11, 2017, in accordance with Idaho IDAPA 58.01.01.209.01.c. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: <http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

Comment 1: We request that DEQ provide an explanation of its understanding of the operating history for facility under consideration in this permit. In addition, we request DEQ explain actions it will be taking to identify and permit facilities, like this, that have been operating without proper air quality permits for years.

In DEQ's Statement of Basis (SOB), the Facility Information section on page 5 explains that the facility under consideration was constructed in 1957. Based on information we received from DEQ, we now understand that this facility has operated ever since its construction in 1957. However, the proposed PTC would be the first air quality operating permit for this facility. This means that the facility has been operating without a permit for years.

While we appreciate the applicant's initiation of the permitting process at this time, it does not excuse years of unpermitted operations. If nothing else, DEQ should provide a far more detailed explanation of these circumstances in the SOB. But we also request DEQ explain whether it will take any action with regard to the unpermitted operations of Dahle's Red-E-Mix. Furthermore, we request DEQ explain additional actions it will take to identify facilities, like this one, that are also likely to be operating without air quality permits. Finally, we request DEQ reevaluate this permit in light of the unpermitted operations and make adjustments accordingly. One example of which, we explain below.

Response 1: The existing facility is located in a remote area of Idaho and has had no previous history of public complaints made to DEQ. DEQ became aware of this unpermitted source through an inspection of permitted units from the same owner. DEQ has determined that although the concrete batch plant was grandfathered from air quality permitting when initially constructed sometime in 1957, the facility acknowledged several plant modifications have taken place since that time and that DEQ has determined a Permit to Construct is now required.

In regards to DEQ's efforts in finding existing unpermitted facilities in the state of Idaho, DEQ's six Regional Offices would be glad to follow up on any leads the public may have as DEQ has a limited number of resources dedicated to inspecting sources. As for further details of any on-going compliance or enforcement actions, it is not be appropriate to include this information in the SOB. The SOB is reserved specifically for the explanation of the Agency's decision to issue or deny a permit.

Comment 2: Process Weight Calculation - On page 15 of the SOB, DEQ incorrectly calculated the process weight limitations for particulate matter. DEQ based these calculations on the formula used for equipment that commenced operation before October 1, 1979. Although the concrete mixer in this case commenced operation before October 1, 1979, it has operated without a permit for so long that this proposed PTC should apply regulations as if the facility was beginning operations today. This is, in part, justified by our understanding that many of the facilities components are newly installed, such as the baghouses and truck. We request DEQ use the formula stated at IDAPA 58.01.01.701.01.b for determining process weight limitations for particulate matter. And we request, DEQ reevaluate all other regulatory requirements in this permit that are based on the date equipment commenced operation and adjust accordingly. If DEQ declines this request, we further request DEQ explain its decision.

Response 2: IDAPA 58.01.01.701 through 703 establish particulate matter (PM) emission rate limits for process equipment based upon when the piece of equipment commenced operation and the equipment's process weight throughput in pounds per hour (lb/hr). The rule does not state that the emission rate is based upon when the equipment was permitted. PM emission rate limits for this facility were calculated in accordance with IDAPA 58.01.01.702.b, based upon the facility commencing operation prior to October 1, 1979. The allowable emission rate limit was determined to be 30.28 lb-PM/hr. The potential to emit for the operation as proposed by the Applicant is 0.16 lb-PM/hr. Therefore, compliance with IDAPA 58.01.01.702.b has easily been demonstrated for this process. However, if the facility had commenced operation after October 1, 1979, the emission rate limit calculations following IDAPA 58.01.01.701.b show an allowable limit of 23.30 lb-PM/hr. Therefore, the permitted PM emissions from this process are in compliance with IDAPA 58.01.01.701.b and 702.b, and the date of commencing operation for the process has no effect on DEQ's decision to issue the permit to the Applicant. Please note that the permit SOB has been modified to reflect compliance with both allowable PM emissions rate calculations.

Comment 3: Fugitive Emission Recordkeeping - We request that DEQ amend the monitoring and recordkeeping requirement for fugitive dust at Permit Condition 2.4 to read as follows: "The permittee shall conduct a facility-wide inspection of potential sources of visible fugitive emissions under normal operating conditions, between the hours of 12:00 PM and 5:00 PM, once each day that the concrete batch plant operates..." The primary variable affecting fugitive dust is wind, so the permittee should be taking records for fugitive dust during the time of day most likely to experience the strongest wind levels. If DEQ declines this request, we further request DEQ explain its decision.

Response 3: DEQ developed permit condition 2.4 to provide monitoring to demonstrate compliance with IDAPA 58.01.01.650 and 651 as required by permit condition 2.1. Specifying hours to perform the monitoring of fugitive emissions at the facility does not provide additional compliance with the requirement that "All reasonable precautions shall be taken to prevent particulate matter from becoming airborne" so long as monitoring occurs once per day as required by the permit.

Comment 4: Load Out Explanation of Assumptions - We request that DEQ provide a more detailed explanation for its analysis of Load Out Emissions, and that any assumptions made regarding these emissions be reflected in the SOB and final permit. In Appendix A of the SOB, Load Out emissions are listed as not included "as they are considered fugitive." It is our understanding that Load Out emissions for this facility are not actually considered fugitive. Accordingly, whatever Load Out emissions that might escape from this facility must be accounted for and included in the Potential to Emit analysis.

Response 4: DEQ included loadout emissions at this concrete batch plant. The wording in the emissions inventory spreadsheet was corrected to reflect this.

Appendix
Public Comments Submitted for
Permit to Construct
P-2017.0036



IDAHO
CONSERVATION
LEAGUE

208.265.9565 • PO Box 2308, Sandpoint, ID 83864 • www.idahoconservation.org

Tanya Chin
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Submitted via email to: tanya.chin@deq.idaho.gov and rakael.pope@deq.idaho.gov

September 11, 2017

RE: Dahle's Red-E-Mix, Proposed Air Quality Permit to Construct

Dear Ms. Chin:

Thank you for the opportunity to comment on proposed air quality permit to construct (PTC) for Dahle's Red-E-Mix. Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's human health and environment.

Attached, please find my comments on behalf of the Idaho Conservation League regarding the proposed PTC for Dahle's Red-E-Mix.

Thank you for your time and consideration. Please do not hesitate to contact me at (208) 265-9565 or mnykiel@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,

Matthew Nykiel
Conservation Associate

ICL Comments

Unpermitted Operations

We request that DEQ provide an explanation of its understanding of the operating history for facility under consideration in this permit. In addition, we request DEQ explain actions it will be taking to identify and permit facilities, like this, that have been operating without proper air quality permits for years.

In DEQ's Statement of Basis (SOB), the Facility Information section on page 5 explains that the facility under consideration was constructed in 1957. Based on information we received from DEQ, we now understand that this facility has operated ever since its construction in 1957. However, the proposed PTC would be the first air quality operating permit for this facility. This means that the facility has been operating without a permit for years.

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Process Weight Calculation

On page 15 of the SOB, DEQ incorrectly calculated the process weight limitations for particulate matter. DEQ based these calculations on the formula used for equipment that commenced operation before October 1, 1979. Although the concrete mixer in this case commenced operation before October 1, 1979, it has operated without a permit for so long that this proposed PTC should apply regulations as if the facility was beginning operations today. This is, in part, justified by our understanding that many of the facilities components are newly installed, such as the baghouses and truck.

We request DEQ use the formula stated at IDAPA 58.01.01.701.01.b for determining process weight limitations for particulate matter. And we request, DEQ reevaluate all other regulatory requirements in this permit that are based on the date equipment commenced operation and adjust accordingly. If DEQ declines this request, we further request DEQ explain its decision.

Fugitive Emission Recordkeeping

We request that DEQ amend the monitoring and recordkeeping requirement for fugitive dust at Permit Condition 2.4 to read as follows: "The permittee shall conduct a facility-wide inspection of potential sources of visible fugitive emissions under normal operating conditions, between the hours of 12:00 PM and 5:00 PM, once each day that the concrete batch plant operates..."

The primary variable affecting fugitive dust is wind, so the permittee should be taking records for fugitive dust during the time of day most likely to experience the strongest wind levels.

If DEQ declines this request, we further request DEQ explain its decision.

Load Out Explanation of Assumptions

We request that DEQ provide a more detailed explanation for its analysis of Load Out Emissions, and that any assumptions made regarding these emissions be reflected in the SOB and final permit.

In Appendix A of the SOB, Load Out emissions are listed as not included "as they are considered fugitive." It is our understanding that Load Out emissions for this facility are not actually considered fugitive. Accordingly, whatever Load Out emissions that might escape from this facility must be accounted for and included in the Potential to Emit analysis.