

Lane Regional Air Pollution Authority
Air Contaminant Discharge Permit

REVIEW REPORT

Oregon Ready-Mix LLC

Permit No. 209554

1. General Background Information

Oregon Ready-Mix LLC (Oregon Ready-Mix) operates a batch concrete plant in Cottage Grove. Oregon Ready-Mix was formerly Z & W Rock and Ready-Mix (Z & W). Oregon Ready-Mix purchased the facility from Z & W in February of 2000. The current facility at Oregon Ready-Mix does not have the rock crushing operation that was formerly permitted under the Z & W Air Contaminant Discharge Permit (ACDP), but only the ready-mix operation. The facility produces 25,000 cubic yards per year of ready-mix concrete. The facility operates 2080 hours per year (8 hours per day, 5 days per week, 52 weeks per year).

2. Reasons for Permit Issuance

This source is listed in Table II, Part A, of LRAPA's Title 34 and, therefore, is required to have an ACDP. This is an existing facility with a new owner applying for a renewal of its ACDP.

3. Performance Testing

Applicable requirements do not call for performance testing to be completed by this source.

4. Plant Site Emission Limits (PSELs)

The main regulated pollutants emitted from processes at this facility are particulate matter (PM) and PM less than ten microns in diameter (PM₁₀).

Baseline Emissions Rate (BER)

Oregon Ready-Mix purchased the facility in the year 2000. The BER is set at zero for all pollutants.

Plant Site Emission Limits

Based on DEQ emission factors and information contained in the permit application, the emissions of PM and PM¹⁰ from the batch concrete plant are estimated to be:

$$25,000 \text{ yds}^3/\text{yr} \times 0.2 \text{ lb}/\text{yd}^3 \times \text{ton}/2,000 \text{ lbs} = 2.5 \text{ tons PM}/\text{yr}$$

and,

$$25,000 \text{ yds}^3/\text{yr} \times 0.03 \text{ lb PM}^{10}/\text{yd}^3 \times \text{ton}/2,000 \text{ lbs} = 0.4 \text{ tons PM}^{10}/\text{yr}$$

and,

$$25,000 \text{ yds}^3/\text{yr} \times 0.2 \text{ lb PM}/\text{yd}^3 \times 1 \text{ yr}/260 \text{ days} \times 1.2$$

$$= 23.1 \text{ lbs PM}/\text{day}$$

and,

$$25,000 \text{ yds}^3/\text{yr} \times 0.03 \text{ lb PM}^{10}/\text{yd}^3 \times 1 \text{ yr}/260 \text{ days} \times 1.2$$

$$= 3.5 \text{ lbs PM}^{10}/\text{day}$$

The daily batch concrete PM and PM¹⁰ emissions are calculated using the yearly emissions, and based upon an operating schedule of 260 days/year and multiplied by 1.2 for operational flexibility. The emission factors are from the Oregon DEQ (10/26/99). Emissions of PM¹⁰ are assumed to equal 15% of PM emissions.

Daily
(pounds)

<u>Source</u>	<u>PM</u>	<u>PM₁₀</u>
Ready-Mix	23.1	3.5

Annual
(tons)

<u>Source</u>	<u>PM</u>	<u>PM₁₀</u>
Ready-Mix	2.5	0.4

5. PM Emission Limitation and Visible Emissions

LRAPA's process weight rule limits emissions of PM for specific processes as a function of the amount of material processed. [LRAPA 32-045(A)] The maximum daily allowable rate for the ready-mix operation is 115 cubic yards per day, or 14.4 cubic yards per hour at 8 hours per day. The associated hourly weight throughput from the ready-mix operation is 20.2 tons. The process weight rule in Table I of Title 32-limits the PM emissions to the following:

$$\text{Emission Limit} = (55.0 \times 20.2^{0.11}) - 40$$

$$= 36.5 \text{ lbs/hr}$$

The expected PM emissions from the batch concrete operation are 2.9 pounds per hour. Therefore, this source will be in compliance with the process weight emission limit if the source is in compliance with the daily PSEL.

Visible emissions from the batch concrete plant must not exceed 20% opacity. [LRAPA 32-010]

6. Pollution Controls and Typically Achievable Control Technology (TACT)

LRAPA Title 32-008 requires an existing emission unit at a source to meet TACT if the emissions unit has emissions of criteria pollutants greater than ten (10) tons per year of any gaseous pollutant or five (5) tons per year of particulate, the emissions unit is not subject to the emissions standards under LRAPA Title 32, Title 33, Title 39, or Title 46 for the pollutants emitted, and the source is required to have a permit. The source emits less than 5 tons per year of PM and less than 10 tons per year of gaseous pollutants and is therefore not

required to meet TACT. LRAPA has determined that control equipment is not typically used for the emission units at this facility.

7. New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

This requirement applies to major new sources or major modifications. Because the emissions of PM and PM₁₀ are below the Significant Emission Rates (SERs) of 25 and 15 tons per year, respectively, in LRAPA Title 38, the source is not subject to the NSR and PSD requirements for major sources of PM and PM₁₀.

8. New Source Performance Standards (NSPS)

This source meets the definition of a new non-metallic mineral processing plant. According to LRAPA Title 46 (Section 46-714), affected facilities which are not located at a major source are not subject to NSPS. Since this facility is not located at a major source, it is not subject to NSPS.

9. Monitoring

The source is required to maintain daily production records and hours of operation.

10. Production Limits

This source is permitted for a maximum production rate of 25,000 cubic yards per year and 115 cubic yards per hour of ready-mix. The source is required to keep material throughput records for verification of this limit.

11. Public Notice

The draft permit was on public notice from May 31, 2001 to July 2, 2001. No written comments were received during the 30-day comment period.