

ASSIGNMENT

to

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
 1010 Main Street
 Springfield, OR 97477
 (541) 736-1056

PERMITTEE:

Willamette Graystone, Inc.
 P.O. Box 7816
 Eugene, OR 97401

INFORMATION RELIED UPON:

Application No.: 52966
 Date Received: May 13, 2008

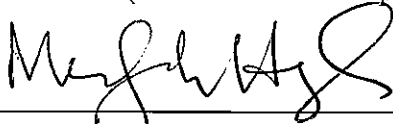
PLANT SITE LOCATION:

3700 Franklin Blvd.
 Eugene, OR 97403

**LAND USE COMPATIBILITY
STATEMENT: July 9, 1998**

Approving Authority: City of Eugene

ASSIGNMENT: The permittee identified above is assigned by the Lane Regional Air Protection Agency to the General ACDP listed below in accordance with ORS 468A.040, LRAPA Title 37 Section 37-0060(2) and based on the land use compatibility findings included in the permit record (note: land use compatibility statements are not applicable to portable sources).



Merlyn L. Hough, Director

MAR 25 2009

Dated

General Air Contaminant Discharge Permit Issued in Accordance with Section 37-0060:

General ACDP Number	Expiration Date	Source Category Description	SIC
AQGP-009	10/14/2018	Concrete Manufacturing	3271

SUPPLEMENTAL INFORMATION:

Facility contact:		
Name:	Travis Davis, Production Manager	
Phone number:	541-726-7666	
Facsimile number:	unknown	
e-mail address:	unkown	
Permit Summary:		
Source Test Requirement	No	NA
NSPS (40 CFR Part 60)	No	NA
NESHAP (40 CFR Part 63)	No	NA
Reports Required:		
Annual	Yes	February 15 th each year
NSPS	No	NA
NESHAP	No	NA
Other	Yes	
Public Notice	Category I	
Application review report:		
LRAPA has reviewed the application for assignment to the General ACDP and determined that the application is complete and the subject facility qualifies for assignment to the General ACDP.		

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

This permit is issued in accordance with the provisions of ORS 468A.040 and incorporated into Title 37 Section 37-0060 by LRAPA for the following source category:

Stationary and portable concrete manufacturing, including ready-mix and Cement Treated Base, and associated material handling activities such as storage piles, conveyors, and vehicle traffic. Other equipment may include electrical generators with internal combustion engines. SIC 3271, 3272, 3273

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1.0 PERMIT ASSIGNMENT

- 1.1 Qualifications** All of the following conditions must be met in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):
- a. The permittee is performing the concrete manufacturing activities listed on the cover page of this permit, including supporting activities.
 - b. A Simple or Standard ACDP is not required for the source.
 - c. The source is not having ongoing, recurring or serious compliance problems.
- 1.2 Assignment** LRAPA will assign qualifying permittees to this permit that have and maintain a good record of compliance with LRAPA's Rules and Regulations and that LRAPA determines would be appropriately regulated by a General ACDP. LRAPA may rescind assignment if the permittee no longer meets the requirements of LRAPA Title 37, Section 37-0060 and the conditions of this permit.
- 1.3 Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as conditions of this permit are complied with. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain a Standard Permit or additional General ACDPs, if applicable.
- 1.4 Relation to local land use laws** This permit is valid in all areas of the state of Oregon. This permit is not valid at any location where the operation of the permittee's processes, activities, and insignificant activities would be in violation of any local land use or zoning laws. For operation outside Lane County, contact the Oregon Department of Environmental Quality for any necessary permits or notifications at (503) 229-5359. It is the permittee's sole responsibility to obtain local land use approvals as, or where, applicable before operating this facility at any location.

2.0 GENERAL EMISSION STANDARDS AND LIMITS

- 2.1 Visible Emissions** The permittee must comply with the following visible emission limits, as applicable:
- a. Emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one hour.
- 2.2 Fugitive Emissions** The permittee must control fugitive dust emissions by:
- a. Controlling vehicle speeds on unpaved roadways.
 - b. Treating vehicular traffic areas of the plant site under the control of the permittee.
 - c. Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times.
 - d. Treating storage piles, as necessary.
 - e. Prompt removal of “tracked-out” material from paved areas.
 - f. Storing collected materials from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer.
- 2.3 Particulate Matter Fallout** The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. LRAPA will verify that the deposition exists and will notify the permittee that the deposition must be controlled.
- 2.4 Nuisance and Odors** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel.
- 2.5 Fuels and Fuel Sulfur Content** The permittee must not use any fuel other than natural gas, propane, butane, ASTM grade fuel oils, or on-specification used oil.
- a. Fuel oils must not contain more than:
 - i. 0.3% sulfur by weight for ASTM Grade 1 distillate oil;
 - ii. 0.5% sulfur by weight for ASTM Grade 2 distillate oil;

- iii. 1.75% sulfur by weight for residual oil;
- b. The permittee is allowed to use on-specification used oil that contains no more than 0.5% sulfur by weight. The permittee must obtain analyses from the marketer or, if generated on site, have the used oil analyzed, so that it can be demonstrated that each shipment or batch of oil does not exceed the used oil specifications contained in 40 CFR Part 279.11, Table 1.

3.0 OPERATION AND MAINTENANCE REQUIREMENTS

- 3.1 Work practices** The permittee must employ bag filters on the silo(s) and water sprays on the truck loader to minimize fugitive dust emissions.
- 3.2 Fugitive Emissions Control Plan** While operating in the Eugene-Springfield Urban Growth Boundary, the permittee must prepare and implement site-specific plans for the control of fugitive emissions.
- 3.3 O&M plan** While operating in the Eugene-Springfield Urban Growth Boundary, the permittee must prepare and implement an operation and maintenance (O&M) plan.

4.0 PLANT SITE EMISSION LIMITS

4.1 Plant Site Emission Limits (PSEL)

Plant site emissions must not exceed the following:

Pollutant	Limit	Units
PM	24	tons per year
PM ₁₀	14	tons per year
SO ₂	39	tons per year
NO _x	39	tons per year
CO	99	tons per year
VOC	39	tons per year

4.2 Annual Period

The annual plant site emissions limits apply to any 12-consecutive calendar month period.

5.0 COMPLIANCE DEMONSTRATION

5.1 Fuel Sulfur Monitoring

If fuel oil is burned, the permittee must either obtain a certificate from the vendor stating that the fuel sulfur content complies with the limits in Condition 2.5, or have a sample of the fuel analyzed in accordance with the appropriate ASTM analytical procedures. If the permittee has samples analyzed for sulfur, a sample must be collected from the holding tank just after each shipment of oil is added to the tank.

5.2 PSEL Compliance Monitoring

Compliance with the PSEL is determined for each 12-consecutive calendar month period based on the following calculation for each pollutant:

$$E = \Sigma(EF \times P)/2000$$

where,

- E = pollutant emissions (ton/yr);
- EF = pollutant emission factor (see below);
- P = process production (cubic yards of concrete and gallons of fuel burned for the generators)

5.3 Emission Factors

The permittee shall use the emission factors provided in the

attachment to the review report for PSEL compliance monitoring as required by Condition 5.2.

6.0 RECORDKEEPING REQUIREMENTS

- 6.1 Operation and Maintenance** The permittee must maintain the following records related to the operation and maintenance of the plant and associated air contaminant control devices:
- a. Concrete produced in Lane County on a monthly basis for each site of operation;
 - b. Concrete produced in Lane County PM₁₀ Nonattainment Areas on a daily basis for each site of operation;
 - c. Types and quantities of fuels burned in the generator(s) in Lane County on a monthly basis for each site of operation;
 - d. Types and quantities of fuel burned in the generator(s) in PM₁₀ Nonattainment Areas in Lane County on a daily basis for each site of operation;
 - e. Sulfur content from vendor certification of each shipment of fuel oil, if used at the plant; and
 - f. If used oil is used, the permittee must obtain analyses from the marketer or, if generated on site, have the used oil analyzed, so that it can be demonstrated that each shipment or batch of oil does not exceed the used oil specifications contained in 40 CFR Part 279.11, Table 1.
- 6.2 Excess Emissions** The permittee must maintain records of excess emissions as defined in LRAPA Title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60-minute period.
- 6.3 Complaint Log** The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.
- 6.4 Retention of Records** Unless otherwise specified, all records must be maintained on site for a period of two (2) years and made available to the LRAPA

upon request.

7.0 REPORTING REQUIREMENTS

- 7.1 Excess Emissions** The permittee must notify LRAPA by telephone or in person of any excess emissions which are of a nature that could endanger public health.
- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the LRAPA office identified in Condition 8.3.
 - b. If the excess emissions occur during non-business hours, the permittee must notify the Department by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
 - c. The permittee must also submit follow-up reports when required by LRAPA.
- 7.2 Annual Report** The permittee must submit to LRAPA by **February 15** of each year this permit is in effect, two (2) copies of the following information for the preceding calendar year:
- a. Operating parameters:
 - i. Amount of concrete produced in Lane County on an annual basis (cubic yards).
 - ii. Types and quantities of fuels burned in the generator in Lane County on an annual basis.
 - iii. A list of and dates and times of operation in all Lane County PM₁₀ nonattainment areas; including annual and maximum daily concrete production and annual and maximum daily fuel usage in the generator(s) in these areas.
 - b. Records of all planned and unplanned excess emissions events.
 - c. Summary of complaints related to air quality received by permittee.
 - d. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.

- e. List major maintenance performed on pollution control equipment.

- 7.3 Initial Startup Notice** The permittee must notify LRAPA in writing of the date a new facility is started up. The notification must be submitted no later than seven (7) days after startup.
- 7.4 Portable Plants - Relocation Notice** If the facility is portable, the permittee must not install or operate the facility or any portion of the facility at any new site without first providing written notice to the Permit Coordinator in the LRAPA office. The written notice must include the date of the proposed move, approximate dates of operation, a detailed map showing access to the new site, and a description of the air pollution controls and procedures to be installed, operated, and practiced at the new site. Additional permits may be required if the permittee operates individual components of the facility at more than one site at a time.
- 7.5 Notice of Change of Ownership or Company Name** The permittee must notify LRAPA in writing using a LRAPA "Permit Application Form" within 60 days of the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
 - b. Sale or exchange of the activity or facility.
- 7.6 Construction or Modification Notices** The permittee must notify the Department in writing using a LRAPA "Notice of Construction Form," or "Permit Application Form," and obtain approval in accordance with LRAPA Title 34 Section 34-010 through 34-038 before:
- a. Constructing or installing any new source of air contaminant emissions, including air pollution control equipment;
 - b. Modifying or altering an existing source that may significantly affect the emission of air contaminants;
 - c. Making any physical change which increases emissions; or
 - d. Changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation that result in increased emissions.
 - e. Relocating an existing stationary source or any portion of an existing stationary source.
- 7.7 Where to Send Reports and Notices** Reports and notices, with the permit number prominently displayed, must be sent to the Permit Coordinator for the LRAPA office as identified in Condition 8.2.

8.0 ADMINISTRATIVE REQUIREMENTS

8.1 Reassignment to the General ACDP A complete application for reassignment to this permit is due within 60 days after the permit is reissued. LRAPA will notify the permittee when the permit is reissued. The application must be sent to the LRAPA office as listed in Condition 8.2.

- a. If LRAPA is delinquent in renewing the permit, the existing permit will remain in effect and the permittee must comply with the conditions of the permit until such time that the permit is reissued and the source is reassigned to the permit.
- b. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the General ACDP until LRAPA takes final action on the permit application.
- c. If a complete application for reassignment to the General ACDP or Simple or Standard ACDP is filed with LRAPA in a timely manner, the permit will not be deemed to expire until final action has been taken on the application.

8.2 Permit Coordinator Address All reports, notices, and applications should be directed to the Permit Coordinator as follows:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

8.3 LRAPA Contacts Information about air quality permits and LRAPA's regulations may be obtained from the LRAPA web page at www.lrapa.org. All inquiries about this permit should be directed to the LRAPA office listed in Condition 8.2.

9.0 FEES

9.1 Annual Compliance Fee The Annual Compliance Determination Fee specified in LRAPA Title 37, Section 37-0090, Table 2, Part 2(c) for a Class One General ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.

- 9.2 Change of Ownership or Company Name Fee** The non-technical permit modification fee specified in LRAPA Title 37, Section 37-0090, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company of a source assigned to this permit.
- 9.3 Where to Submit Fees** Fees must be submitted to the LRAPA office address listed in Condition 8.2.

10.0 GENERAL CONDITIONS AND DISCLAIMERS

- 10.1 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.
- 10.2 Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 10.3 Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.
- 10.4 LRAPA Access** The permittee must allow the LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468.095.
- 10.5 Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 10.6 Open Burning** The permittee may not conduct any open burning except as allowed by LRAPA Title 47.
- 10.7 Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.
- 10.8 Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 10.9 Termination,** LRAPA may modify or revoke this permit pursuant to LRAPA

**Revocation, or
Modification**

Title 37, Section 37-0060(3) and (4).

11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NSR	New Source Review
ASTM	American Society for Testing and Materials	O ₂	oxygen
AQMA	Air Quality Maintenance Area	OAR	Oregon Administrative Rules
bb1	barrel (42 gal)	ORS	Oregon Revised Statutes
calendar year	The 12-month period beginning January 1 st and ending December 31 st	O&M	operation and maintenance
CFR	Code of Federal Regulations	Pb	lead
CO	carbon monoxide	PCD	pollution control device
date	mm/dd/yy	PM	particulate matter
DEQ	Oregon Department of Environmental Quality	PM ₁₀	particulate matter less than 10 microns in size
dscf	dry standard cubic foot	ppm	part per million
EPA	US Environmental Protection Agency	ppmv	part per million by volume
FCAA	Federal Clean Air Act	PSD	Prevention of Significant Deterioration
gal	gallon(s)	PSEL	Plant Site Emission Limit
gr/dscf	grains per dry standard cubic foot	PTE	Potential to Emit
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44	RACT	Reasonably Available Control Technology
ID	identification number	scf	standard cubic foot
I&M	inspection and maintenance	SER	Significant Emission Rate
lb	pound(s)	SERP	Source Emission Reduction Plan
LRAPA	Lane Regional Air Protection Agency	SIC	Standard Industrial Code
MMBtu	million British thermal units	SIP	State Implementation Plan
NA	not applicable	SO ₂	sulfur dioxide
NESHAP	National Emissions Standards for Hazardous Air Pollutants	Special Control Area	as defined in LRAPA Title 29
NO _x	nitrogen oxides	VE	visible emissions
NSPS	New Source Performance Standard	VOC	volatile organic compound
		year	A period consisting of any 12 consecutive calendar months

AQGP-009, ready-mix plants

Lane Regional Air Protection Agency

GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ASSESSMENT REPORT

READY MIX AND CTB CONCRETE MANUFACTURING PLANTS

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from stationary and portable concrete manufacturing, including ready mix and CTB plants.
2. The facilities assigned to this General Permit have no other air pollution sources which require regulation beyond that specified in this permit, or have other pollution sources that also qualify for General Permits. Facilities eligible for assignment to this permit have not experienced recurring or serious compliance problems.

ASSESSMENT OF EMISSIONS

3. Facilities assigned to this General Permit are sources of PM and PM₁₀ emissions. Some facilities are portable and may operate generators to produce the energy necessary for the production processes. Generators are also sources of PM and PM₁₀, as well as SO₂, CO, NO_x, and VOC emissions.
4. Potential nuisances originating from this type of operation could include fugitive dust associated with material handling operations and vehicular traffic. The permit includes requirements to control fugitive dust emissions.
5. LRAPA has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit have emission levels below the established levels of concern stated in Tables 2 and 3 of LRAPA Title 12.

SPECIFIC AIR PROGRAM APPLICABILITY

6. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements (control of fugitive dust and odors), and fuel sulfur limits in LRAPA Title 32. The permit contains requirements and limitations to ensure compliance with these standards. The particulate matter emission limits in LRAPA Title 32 are not applicable to these facilities because the emissions are fugitives, which cannot be measured using standard test methods.

COMPLIANCE ASSURANCE

7. Permittees are required to maintain records of production and upset conditions. These items are reported to LRAPA annually.
8. LRAPA staff members perform site inspections of the permitted facilities on a routine basis, and more frequently if complaints are received.

REVOCAION OF ASSIGNMENT

9. Any facility that fails to demonstrate compliance, generates complaints, or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to a higher, more stringent level of permitting.

PUBLIC NOTICE

10. General Air Contaminant Discharge Permits are incorporated into LRAPA Rules and Regulations by reference and are part of the State Implementation Plan. As part of the rulemaking process, the public will be provided at least 30 days to submit written comments or may provide oral testimony at a public hearing that will be held at the end of the comment period. Notice of when and where the hearings will be held will be provided at least 30 days in advance of the hearings. LRAPA will review any comments and may modify the permits in response to the comments. The final permits will be issued after approval by the LRAPA director.

AQGP-009r, ready mix

7/25/01

Max 4/6/07

Ready-Mix Concrete Permit Emission Factors

Emissions device or activity	Pollutant	Emission Factor (EF)	Emission factor units
Concrete Production	PM/PM ₁₀	0.02	lb/cubic yard of concrete
Generator(s) (oil-fired)	PM/PM ₁₀	42.5	lb/1000 gallon of fuel burned
	SO ₂	39.7	lb/1000 gallon of fuel burned
	NO _x	604	lb/1000 gallon of fuel burned
	CO	130	lb/1000 gallon of fuel burned
	VOC	49.3	lb/1000 gallon of fuel burned
Generator(s) (natural gas, propane, and butane -fired)	PM/PM ₁₀	10	lb/million cubic feet of NG burned
	SO ₂	0.6	lb/million cubic feet of NG burned
	NO _x	2840	lb/million cubic feet of NG burned
	CO	399	lb/million cubic feet of NG burned
	VOC	116	lb/million cubic feet of NG burned

Lane Regional Air Protection Agency
General Air Contaminant Discharge Permit

Permit Writer's Review Sheet

Willamette Graystone, Inc.

Permit No. 208876

PERMITTING

Permitting Action

1. The permit is an existing facility applying for renewal, which was issued on July 1, 2003, and was originally scheduled to expire on June 30, 2008. No changes have been made to the permit since the last renewal. The facility has elected to be assigned to the General ACDP for concrete manufacturing.

Other Permits

2. No other permits have been issued or are required by LRAPA for this facility.

Attainment Status

3. The facility is located in an attainment area for all pollutants except PM₁₀ (particulate matter less than 10 microns in size). The Eugene/ Springfield Air Quality Management Area is a non-attainment area for PM₁₀.

SOURCE DESCRIPTION

Overview

4. The facility operates a cement block manufacturing facility at 3700 Franklin Boulevard in Eugene. The source controls PM (particulate matter)/PM₁₀ (particulate matter less than 10 microns in diameter) emissions by the use of two (2) bag filters. Total annual production of finished product by the facility is approximately 3.5 million 8x8x16 equivalents. The netting basis for this source is zero (0) tons/year for all regulated pollutants as per LRAPA's Title 42 – Plant Site Emission Limits.

Process and Control Devices

5. Existing air contaminant sources at the facility consist of the following:
 - a. 1 Cement Silo with exhaust vent bag,
 - b. 1 Flyash Silo with exhaust vent bag, and

- c. 1 Concrete Mixing Plant (wet mixing).

EMISSIONS

6. The pollutants of concern associated with this source type are PM/PM₁₀. Emissions of PM/PM₁₀ are estimated to be 2.3 tons/year. Emission calculation details are as follows:

Device/Process	Pollutant	Cement Blocks Produced (cu yd/year)	Emission Factor (lb/cu yd)	Emissions
Cement Block Manufacturing	PM/PM ₁₀	230,453*	0.02	= 2.3 tons/year

* Assumptions:

- 3.5 million 8"x8"x16" equivalents produced,
- 8"x8"x16" is equivalent to 1024 cubic inches,
- 1024 cubic inches is equivalent to 0.0658 cubic yards,
- 3.5 million x 0.0658 cubic yards = 230,453 cubic yards,

NESHAPS/MACT APPLICABILITY

7. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated.

NSPS APPLICABILITY

8. There are no sources at this facility for which NSPS standards have been promulgated.

PUBLIC NOTICE

Renewal

9. Assignment to a General ACDP is classified as a Category I permit action requiring no public notice. The General ACDP was placed on public notice as part of the rulemaking process.

Max
3/17/09