



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

C.L. "Butch" Otter, Governor  
John H. Tippetts, Director

September 12, 2016

Molly Prickett,  
Environmental Engineer  
P4 Production, L.L.C.  
1853 Hwy 34  
P.O. Box 816  
Soda Springs, ID 83276-0816

RE: Facility ID No. 029-00043, P4 Production Quartzite Quarry, Soda Springs  
Final Permit Letter

Dear Ms. Prickett:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2016.0025 Project 61715 to P4 Production Quartzite Quarry located at Soda Springs for the installation of the new replacement jaw crusher. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received May 3, 2016 and on all relevant comments received on DEQ's proposed permit during the public comment period.

This permit is effective immediately. This permit does not release P4 Production Quartzite Quarry from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Pocatello Regional Office, 444 Hospital Way, #300, Pocatello, ID 8320, Fax (208) 236-6168.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Pocatello Regional Office Representative Rick Elkins, Air Quality Analyst, at (208) 236-6160 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other 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 Tom Burnham at (208) 373-0502 or [tom.burnham@deq.idaho.gov](mailto:tom.burnham@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\tb  
Permit No. P-2016.0025 PROJ 61715  
Enclosures

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** P4 Quartzite Quarry  
**Permit Number** P-2016.0025  
**Project ID** 61715  
**Facility ID** 029-00043  
**Facility Location** 1973 Government Dam Road  
Soda Springs, ID 83276

### Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) 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; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) 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; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho 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. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

**Date Issued** September 12, 2016

  
Tom Burnham, Permit Writer

  
Mike Simon, Stationary Source Manager

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# 1 Permit Scope

## Purpose

- 1.1 This is the initial permit to construct (PTC) for replacement of the primary Jaw Crusher and for the existing Secondary Cone Crusher and Primary Triple Deck Screens, which have been operating at the quartzite quarry since the 1970s as components of a grandfathered source that did not require a permit to construct or operate. This PTC also includes NSPS requirements for the replacement primary crusher. Present emission levels are maintained by throughput limits on the replacement primary Jaw Crusher.

## Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Primary Jaw Crusher Manufacturer: Metso Model: Nordberg C150 Year manufactured: 2015 Maximum throughput: 970 T/hr	Baghouse BH-01 Manufacturer: OptiFlo Model: 1646868-001 Flowrate: 10,000 dscfm
2	Secondary Cone Crusher Manufacturer: Metso Model: Nordberg Symons Year manufactured: 1968 Maximum throughput: 410 T/hr	Baghouse BH-02 Manufacturer: OptiFlo Model: 1646892-001 Flowrate: 7,150 dscfm
2	Primary Triple Deck Screens Manufacturer: JCI Model: 6203S-32LT Year manufactured: 2011-2012 Maximum throughput: 713 T/hr	Baghouse BH-03 Manufacturer: OptiFlo Model: 1646892-001 Flowrate: 6,200 dscfm

## 2 Rock Crushing Equipment

### 2.1 Process Description

Raw quartzite material is hauled from the pit, emptied into the dump hopper, and screened into the primary jaw crusher. The larger material is crushed and then combined with the smaller material that bypassed the primary crusher, and is conveyed to the coarse stockpile. The primary triple deck screens sort the material to finished, re-crush, and waste streams. The finished material passes through a wet screen and is stockpiled for shipping. The recrush material is crushed in the secondary cone crusher and returned to the triple deck screens and the waste material is stockpiled and utilized for pit backfill and reclamation.

### 2.2 Control Device Descriptions

**Table 2.1 Rock Crushing Equipment Description**

Emissions Units / Processes	Control Devices	Emission Points
Primary Jaw Crusher Manufacturer: Metso Model: Nordberg C150 Year Manufactured: 2015 Capacity: 970 T/hr	Baghouse BH-01 Manufacturer: OptiFlo Model: 1646868-001 Flowrate: 10,000 dscfm	BH-01 stack
Secondary Cone Crusher Manufacturer: Metso Model: Nordberg Symons Year Manufactured: 1968 Capacity: 410 T/hr	Baghouse BH-02 Manufacturer: OptiFlo Model: 1646892-001 Flowrate: 7,150 dscfm	BH-02 stack
Primary Triple Deck Screens Manufacturer: JCI Model: 6203S-32LT Year Manufactured: 2011-2012 Capacity: 713 T/hr	Baghouse BH-03 Manufacturer: OptiFlo Model: 1646892-001 Flowrate: 6,200 dscfm	BH-03 stack

### Emission Limits

#### 2.3 40 CFR 60.672, Subpart OOO - Standard for particulate matter

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under 60.8, emissions from the primary jaw crusher baghouse BH-01 stack shall not exceed 0.032 g/dscm (0.014 gr/dscf) in accordance with 40 CFR 60.672 (a) and Table 2.

#### 2.4 Opacity Limit

Emissions from any baghouse stack, or any other stack, vent, or functionally equivalent opening associated with the crushers and screens, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

## **Operating Requirements**

### **2.5 Throughput Limits**

Quartzite rock hauled to the dump hopper feeding the primary jaw crusher shall not exceed 12,969.6 tons per calendar day for the Primary Jaw Crusher.

### **2.6 Baghouse Operation**

The permittee shall operate baghouses (BH-01, BH-02, and BH-03) to control PM and PM<sub>10</sub> emissions from the crushers.

Within 60 days of initial start-up, the permittee shall have developed a Baghouse System Procedures document for the inspection and operation of the baghouse systems which control emissions from the primary and secondary crushers, and screens. The Baghouse System Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse System Procedures document shall describe the procedures that will be followed to comply with General Provision 3.10 and shall contain requirements for weekly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at any time. At a minimum the document shall include:

- procedures to determine if bags or cartridges are ruptured; and
- procedures to determine if bags or cartridges are not appropriately secured in place.

The Permittee shall maintain records of the results of each baghouse system inspections in accordance with General Provision 3.10. The records shall include, but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse System Procedures document shall be submitted to DEQ within 60 days of permit issuance and shall contain a certification by a responsible official. Any changes to the Baghouse System Procedures document shall be submitted within 15 days of the change.

The Baghouse System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring and recordkeeping requirements specified in the Baghouse System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

## **Monitoring and Recordkeeping Requirements**

### **2.7 Throughput Monitoring**

Quartzite rock emptied into the dump hopper feeding the primary jaw crusher shall be monitored on a calendar day basis to determine compliance with the calendar day throughput limit.

The daily material may be estimated by either:

- (a) actual truck load measurements, or
- (b) using the actual truck maximum payload capacity, or
- (c) an alternate method with DEQ's prior written approval.

### **2.8 40 CFR 60.674, Subpart OOO - Visible Emissions Monitoring**

Each calendar quarter during seasonal operation the permittee shall conduct 30-minute visible emission inspection for baghouse BH-01 using EPA Method 22 in accordance with §60.674(c):

- The inspection shall be conducted while the crusher is operating.
- If visible emissions are observed, the permittee shall initiate corrective action within 24 hours.
- The inspection dates, results, and any corrective actions shall be recorded in a logbook.
- The owner or operator must keep the logbook onsite and make hard or electronic copies (whichever is requested) of the logbook available to the Administrator upon request. In accordance with 40CFR 60.676 (b).

The owner or operator of the affected facility may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to §60.675(b) simultaneously with a Method 22 (40 CFR part 60, appendix A-7) to determine what constitutes normal visible emissions from that affected facility's baghouse when it is in compliance with the applicable PM concentration limit in Table 2 of this subpart. The revised visible emissions success level must be incorporated into the permit for the affected facility in accordance with §60.674(c).

## **Performance Testing Requirements**

### **2.9 40 CFR 60.675, Subpart OOO - Initial PM Performance Test**

For baghouse BH-01 controlling the primary jaw crusher, the permittee shall perform an initial performance test according to 40 CFR 60 §60.8 and §60.675, Subpart OOO.

- The performance test shall be performed within 60 days after achieving the maximum production rate at which the facility will be operated, but not later than 180 days after startup as required under §60.8.
- The permittee shall use Method 5, 17, or 51 of 40 CFR 60.11 to determine the particulate matter concentration.

If the initial performance test date for an affected facility falls during a seasonal shut down (as defined in §60.671 of this subpart) of the affected facility, then with approval from the permitting authority, the owner or operator may postpone the initial performance test until no later than 60 calendar days after resuming operation of the affected facility in accordance with 40 CFR 60 §60.675(i).

## Reporting Requirements

### 2.10 40 CFR 60.676, Subpart OOO – Reporting Requirements

Owners or operators must record each periodic inspection required under Condition 2.8, including dates and any corrective actions taken, in a logbook (in written or electronic format). The owner or operator must keep the logbook onsite and make hard or electronic copies (whichever is requested) of the logbook available to the Administrator upon request (40 CFR 60 §60.676(b)(1)).

- The owner or operator shall submit a written report of the results to DEQ in accordance with 40 CFR 60.676(f) and 60.8.
- The report shall include the performance test result to demonstrate compliance with the particulate matter standards in 40 CFR 60.672, Subpart OOO - Standard for particulate matter found in the Emissions section of this permit.

### 2.11 Baghouse Procedure Reporting Requirement

The Baghouse System Procedures document shall be submitted to DEQ within 60 days of permit issuance and shall contain a certification by a responsible official. The permittee shall send the documents to:

Idaho Department of Environmental Quality  
Pocatello Regional Office  
444 Hospital Way, #300  
Pocatello, ID 83201

## Fugitive Dust

### 2.12 Reasonable Precautions to Prevent Particulate Matter

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651.

Reasonable precautions may include, but are not limited to, the following:

- (a) Use of Water or Chemicals: 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 land.
- (b) Application of Dust Suppressants: Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- (c) Use of Control Equipment: 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.
- (d) Covering of Trucks: Covering, when practical, open bodied trucks transporting materials likely to give rise to airborne dusts.
- (e) Paving: Paving of roadways and their maintenance in a clean condition, where practical.
- (f) Removal of Materials: Prompt removal of earth or other stored material from streets, where practical.

### 2.13 Best Management Practices to Control Fugitive Dust

The owner or operator shall use the Best Management Practices (BMP) contained in IDAPA 58.01.01.799 to control the fugitive dust emissions. The BMP requirements are as follows:

- (a) Control strategy triggers: The owner or operator shall at all times be observant of all sources

of fugitive dust emissions and monitor control strategies at least once per day when operating. When fugitive dust emissions are observed at any time to be exceeding any applicable control strategy trigger specified in IDAPA 58.01.01.799.02-06, that event shall trigger initiation of the prescribed control strategy or control strategies to control the fugitive dust emissions.

- (b) Control strategies: A progressive control strategy shall be used to reasonably control the emissions of fugitive dust. Progressive control strategy means that if the initial control strategy or strategies chosen do not adequately control fugitive dust emissions, the owner or operator shall employ successive control strategies as listed until fugitive dust control is achieved. Fugitive dust control shall be applied on a frequency such that visible emissions do not exceed any applicable emission standard specified in IDAPA 58.01.01.790-799.
- (c) Monitoring and recordkeeping shall be done in accordance with the Monitoring and Recordkeeping condition contained in the General Provisions of this permit.

## **Federal Requirements**

### **2.14 Federal Incorporation of Federal Requirements by Reference**

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- New Source Performance Standards (NSPS) Area Sources, 40 CFR Part 60, Subpart  
OOO

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation incorporated by IDAPA 58.01.01.107.03.

### 3 General Provisions

#### General Compliance

3.1 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, 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.]

3.2 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]

3.3 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

3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 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

3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

- 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; and
- 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.

[IDAPA 58.01.01.211.03, 5/1/94]

## Performance Testing

- 3.7** 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.
- 3.8** 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.
- 3.9** Within 60 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 and 4/11/15]

## Monitoring and Recordkeeping

- 3.10** The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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, 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**

- 3.11** The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

## **Certification**

- 3.12** 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**

- 3.13** 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**

- 3.14** 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**

- 3.15** 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**

- 3.16** 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.

[IDAPA 58.01.01.211, 5/1/94]