



Notice of Construction (NOC) Approval

Issued in accordance with:
Chapter 70A.15 RCW, SRCAA Regulation I,
Article V, Chapter 173-400 WAC, and Chapter
173-460 WAC

1610 S. Technology Blvd., Suite 101, Spokane, WA 99224 (509) 477-4727

NOTICE OF
CONSTRUCTION (NOC): #1943

DATE APPROVED: Draft

COMPANY NAME: OLD CASTLE APG d/b/a CENTRAL PRE-MIX CONCRETE INC.
16310 E MARIETTA AVENUE
SPOKANE, WA 99216
509-926-8235

FACILITY LOCATION: SAME

DESCRIPTION OF EQUIPMENT
BEING INSTALLED: ONE LOUISVILLE DRYER COMPANY NATURAL DIRECT
FIRED CONTINUOUS ROTARY DRYER w/ LOW NOX
BURNER (40 MMBtu/hr, 90.43 Tons/hr); ONE LOUISVILLE
DRYER COMPANY PULSE JET BAGHOUSE CONTORLLING
THE DRYER EMISSIONS (21,680 ACFM); and ONE
BAGHOUSE CONTROLLING THE BLOCK PLANT EMISSIONS
(22,000 SCFM)

PREPARED BY: _____
John Conklin

REVIEWED BY: _____
April L. Westby, PE

APPROVED BY: _____
April Westby, Control Officer

PRELIMINARY DETERMINATION

A preliminary determination has been made, based on review of the Notice of Construction (NOC #1943) application. The proposed project, if constructed and operated as described in the NOC application will be in compliance with the applicable rules and regulations, as adopted pursuant to Chapter 70A.15 RCW, including Chapters 173-400 WAC and 173-460 WAC, and SRCAA Regulation I, provided that the following conditions are met:

One-time requirements:

1. SRCAA shall be notified at least one week prior to the anticipated start-up date of any component (dryer, dryer baghouse, or block plant baghouse).
2. This order of approval shall become invalid if any of the following occur:
 - a. Construction of the dryer, dryer baghouse, or relocation of the baghouse has not commenced within eighteen months after the receipt of the approval, or
 - b. Construction of the dryer, dryer baghouse, or relocation of the baghouse is discontinued for a period of eighteen months or more, or
 - c. Construction of the dryer, dryer baghouse, or relocation of the baghouse is not completed within eighteen months of commencement.

SRCAA may extend any of the eighteen month periods referenced above, provided the proponent demonstrates that an extension is justified and the criteria given in SRCAA Regulation I, Section 5.13.B are met.

3. Prior to the dryer, dryer baghouse, or block plant baghouse approved under NOC #1943 being placed into service (For the purpose of this NOC, placed into service means after initial start-up and commissioning), the dryer approved under NOC #579 shall be made inoperable. Additionally, after the dryer, dryer baghouse, or block plant baghouse approved under NOC #1943 are placed into service, The portions of NOC #579 associated with the existing dryer, dryer baghouse, block plant are revoked. NOC #579 will continue to cover the equipment listed in Appendix A of NOC #1943.

On-going Requirements:

4. A copy of the signed NOC #1943 application and the conditions of approval shall be kept at the site and made available to SRCAA personnel upon request.
5. The dryer, dryer baghouse, and block plant baghouse shall be installed and operated as described in the NOC #1943 application.
6. The dryer, dryer baghouse, and block plant baghouse shall be maintained in good operating condition. Within 30 days of the initial start-up of the equipment associated with NOC #1943, an operation and maintenance (O&M) plan(s) shall be developed and submitted to SRCAA for approval which provides a description of how the equipment will be maintained in good operating condition. Previously developed O&M plans and/or manufacturer O&M manuals are acceptable, provided they contain the information described in Condition 6.a – 6.d below. Once approved O&M plan(s) shall be followed. Updates to the O&M Plan(s) must be approved by SRCAA. The O&M plan(s) shall at a minimum include:

- a) Normal operating parameters for the dryer, dryer baghouse, and block plant baghouse, including but not limited to the operating temperatures for the dryer and pressure drop ranges for the baghouses;
- b) A maintenance schedule for the dryer, dryer baghouse, and block plant baghouse;
- c) Monitoring and record keeping requirements for the dryer, dryer baghouse, and block plant baghouse, including sample recordkeeping forms; and
- d) Corrective actions for abnormal dryer, dryer baghouse, and block plant baghouse operation.

The dryer, dryer baghouse, and block plant baghouse shall be maintained and operated according to the O&M plan(s). Records shall be kept of all maintenance performed on the baghouses. The records shall include, at a minimum, the time and dates of the following:

- baghouse pressure drop readings;
- records of any maintenance performed (including baghouse filter replacements); and
- records of any corrective actions taken.

Records shall be kept in accordance with Condition 20.

Baghouse Requirements:

7. The dryer and block plant emissions shall be routed to dryer baghouse and block plant baghouse, respectively, at all times when their associated equipment is operating.
8. Visible emissions from the dryer baghouse or the block plant baghouse exhaust shall not exceed 10% during any six-minute average, as determined using EPA Reference Method 9.
9. The dryer baghouse exhaust stack shall have a minimum height of **42.81** feet above ground level and shall exhaust vertically. No elbows, tees, or stack caps that impede exhaust air flow shall be installed at the end of the stack.
10. The block plant baghouse exhaust stack shall have a minimum height of **19** feet above ground level and shall exhaust vertically. No elbows, tees, or stack caps that impede exhaust air flow shall be installed at the end of the stack.
11. The particulate emission concentration from the exhaust stacks shall not exceed 0.01 grains per dry standard cubic foot of exhaust gas. SRCAA may require testing for this limit at any time, including but not limited to, occasions when the opacity limit specified in Condition 8 is exceeded.
12. The baghouses shall control at least 99.9% (by weight) of the particulate matter collected and vented to the baghouse. Verification of control efficiency may be required by SRCAA at any time, including but not limited to, occasions when the opacity limit in Condition 8 is exceeded.

13. The baghouses may only be bypassed in the event of an emergency. The bypass may continue only as long as it takes to shut down the emission sources feeding into the system. SRCAA shall be notified of any applicable upset conditions, breakdowns, or failures associated with the baghouses. The notification shall occur within 24 hours of the occurrence and in accordance with WAC 173-400-107 and SRCAA Regulation I, Section 6.08.

Dryer Requirements:

14. The dryer shall not process more than **963,600 tons per calendar year** of material. Records shall be kept in accordance with Condition 20.

15. No fuel other than natural gas may be used in the dryer without prior SRCAA approval.

16. The dryer shall not exceed the following emission limits when firing with natural gas at high fire (80% load or higher):

OXIDES OF NITROGEN (NO _x)	CARBON MONOXIDE (CO)
PPMV @ 3% O ₂	PPMV @ 3% O ₂
30	400

17. Within 90 days after the new dryer being placed into service, an initial performance test must be conducted on the dryer to demonstrate compliance with the emission limits given in Condition 16 above. SRCAA may extend this deadline if a request is made in writing and approved within the initial 90 days. The testing, specified below, shall be performed in accordance with SRCAA Regulation I, Section 2.09, unless alternate test methods or equivalent tests are requested in writing and approved by SRCAA:

- a. SRCAA shall be notified at least 30 calendar days prior to the start of the performance test. A written test plan, including a description of the method(s) proposed, shall be submitted to SRCAA for approval at least 30 calendar days prior the start of the initial performance test. Once approved, the test plan shall be followed.
- b. The dryer shall be operated at a minimum of 80% of rated capacity or SRCAA approved alternative firing rate.
- c. Testing of the dryer shall be performed as described below:
 - i) Testing of the dryer shall consist of three separate one-hour runs.
 - ii) The following constituents shall be measured during each test run:
 - Volumetric flow rate and temperature, per EPA Methods 1 & 2;
 - Oxygen (O₂) & Carbon Dioxide (CO₂), per EPA Method 3A;
 - Moisture content, per EPA Method 4;
 - Oxides of Nitrogen (NO_x), per EPA Method 7E; and

- Carbon Monoxide (CO), per EPA Method 10.
- d. A performance test report shall be prepared and submitted to SRCAA within 45 calendar days of completion of the initial performance test.
18. After the initial compliance test described in Condition 17, periodic combustion tests shall be performed on the dryer to verify compliance with the NO_x and CO emission limits given in Condition 9. The tests shall be performed with the dryer operating on high fire (80% or higher load) using a combustion analyzer or SRCAA approved alternative test method. Testing shall be done per the following requirements:
- a. The combustion test must be conducted on the dryer at least once each calendar year, beginning the calendar year after the test described in Condition 17, unless SRCAA approves an alternate testing schedule. The test shall reflect the dryer's operation under actual conditions.
 - b. The combustion test shall be capable of analyzing for NO_x and CO emissions.
 - c. The combustion analyzer shall be calibrated using manufacturer recommended procedures and certified calibration gases, immediately prior to the test.
 - d. During each combustion test, the following operational parameters shall be measured and recorded:
 - i) NO_x and CO concentrations (ppmv) in the exhaust stream;
 - ii) Temperature;
 - iii) Percent O₂ for each NO_x and CO reading; and
 - iv) Average load.
 - e. Reports, documenting the results of each combustion test, shall be submitted to SRCAA within 45 days of the completion of the combustion test:
 - i) A calibration report for the combustion analyzer;
 - ii) A summary of the NO_x and CO emissions given in ppmv and corrected to 3% oxygen;
[NO_x, or CO] ppmv (@ 3% O₂) = Measured [NO_x, or CO] ppmv x (20.9-3)/(20.9 - Measured [NO_x, or CO] %O₂)
(Example: Measured NO_x = 20 ppmv @ 7.5% O₂, & CO = 30 ppmv @ 8.5% O₂;
therefore, NO_x @ 3% O₂ = 20 x $\frac{(20.9-3)}{(20.9- 7.5)}$ = **26.7** ppmv NO_x @ 3% O₂, and
CO @ 3% O₂ = 30 x $\frac{(20.9-3)}{(20.9- 8.5)}$ = **43.3** ppmv CO @ 3% O₂)
 - iii) The parameters listed under d.; and
 - iv) Copies of actual data sheets.
19. **Annual** records shall be kept of the total amount of natural gas burned in the dryer. Site-wide natural gas usage records are acceptable. Records shall be kept in accordance with Condition #20 below.
20. The following records shall be kept on-site for the most recent 24 months of operation and made available to SRCAA personnel upon request:

- a. Completed recordkeeping forms used to document maintenance activities performed on the dryer, dryer baghouse and the block plant baghouse (Condition #5);
 - b. Annual material process records for the dryer (Condition #14) and
 - c. Natural gas usage records (Condition #19).
21. The Control Officer, or duly authorized representative, shall be allowed to enter the facility premises at reasonable times to inspect equipment and/or records specific to the control, recovery, or release of contaminants into the atmosphere, in accordance with SRCAA Regulation I, Article II and RCW 70A.15.2500. For the purposes of this NOC approval, reasonable times include, but are not limited to, any of the following: normal business and/or equipment operating hours, periods of equipment breakdown or malfunction, and times when the Control Officer, or duly authorized representative are investigating air quality complaints filed with agency and/or have reason to believe that air quality violations have occurred or may be occurring. No person shall obstruct, hamper or interfere with any such inspection.
22. It is an ongoing condition of this NOC approval that the source be registered with the Agency. Registration includes the following:
- a. Submittal of updated registration information at least annually as required by SRCAA, using forms provided by SRCAA. The forms provided by the Agency shall be completed and returned to the Agency within 45 days of issuance.
 - b. Timely payment of annual registration fees to SRCAA in the amount required by SRCAA Regulations, as periodically amended. In accordance with SRCAA Regulation I, Section 4.05, Failure to pay registration fees and other related fees within 120 days of the annual registration billing due date will result in an administrative closure of the facility. Re-opening may require a new Notice of Construction application and receipt of an Order of Approval prior to resumption of operation.

This condition is in addition to any other remedies available to the agency for non-compliance with agency regulations, state law or federal law.

General Information

This Notice of Construction approval is specific to the present location (16310 E Marietta Avenue, Spokane, WA 99216) and is not transferable to a new location. If the approved equipment is moved from this site to a new site in Spokane County, a new Notice of Construction may be required.

It should be noted that the approval of this Notice of Construction does not relieve the proponent of the obligation to comply with all other applicable federal, state and local regulations and requirements.

This order of approval may be modified, suspended or revoked in whole or in part for just cause including, but not limited to, the following:

1. Violation of any terms or conditions of this order of approval.
2. Obtaining this order of approval by misrepresentation or failure to disclose fully all relevant facts.

This order of approval may be appealed as described below:

Pursuant to the Revised Code of Washington (RCW) 43.21B, you have the right to appeal this Order by filing a notice of appeal with both the Pollution Control Hearings Board (PCHB) and the Spokane Regional Clean Air Agency (SRCAA) on or before the 30th day of receipt of SRCAA's order, permit, license, Notice and Order of Assessment of Civil Penalty, or Notice of Disposition.

Required procedures are detailed in state law (Chapter 43.21B RCW and Chapter 70A.15 RCW) and the PCHB's own regulations (Chapter 371.08 Washington Administrative Code) which may be found in many public libraries, county and municipal law libraries or on the Internet at www.access.wa.gov/. Since others publish these documents, copies are not available from SRCAA.

If you are filing an appeal, mail, deliver, or fax it to SRCAA and the PCHB at:

SRCAA Address

SRCAA
1610 S. Technology Blvd, Suite 101
Spokane, WA 99224

PCHB Mailing Address

PCHB
Environmental & Land Use Hearings Office
P.O. Box 40903
Olympia, WA 98504-0903

SRCAA Fax Number

(509) 477-6828

PCHB Fax Number

(360) 586-2253

PCHB Physical Address

PCHB
1111 Israel Rd. SW. Ste 301
Tumwater, WA 98501

Appendix A

In addition to the equipment permitted under this NOC. The following equipment is permitted under other NOCs at the 16310 E Marietta Ave location:

Dry Mix Plant NOCs

NOC #	Date Issued	Description
#579	12/7/1994	Besser Apco DCS-250 baghouse for dry mix silos
		Jet-Aire Model JA-400-DA baghouse for controlling dust from operations inside the dry-mix building
		Mixer Systems Turbin Mixer; 1 model 100 & 1 model 200, both vented to JA-400-DA baghouse
#721	6/19/1996	Torit Baghouse for use on lime silo
		Quadra Model 500 for use on split silo
		Besser Appco DCS-250 for use on Portland cement silo
#784	1/2/1997	Torit bin vent baghouse on the dry aggregate storage bins (Replaced a baghouse originally permitted under NOC #579)
#1207	1/2/2004 Revised: 5/4/2016	UAS Model SFC 48-4 cartridge baghouse for concrete bagging operation at the dry-mix plant
#1440	7/16/2008	Installation of a UAS Model SFC 48-4 cartridge baghouse for concrete bagging operation at the dry-mix plant
#1866	1/3/2022	Donaldson Torit model 356rfwh12 baghouse (33,948 scfm 356 bags; 5,557 ft ²) for control of dust from operations in dry-mix building

Block Plant NOC

NOC #	Date Issued	Description
#579	12/7/1994	Kiln-Johnson Cure – Pak steam generator – Model SP-5000 and Five – 1 MMBTU/hr. burners (no direct vent to atmosphere)
		Murphy Baghouse for Columbia Gearbox Batch Mixer
#1332	1/20/2006	Donaldson Torit Baghouse for the block plant finishing equipment located in the new block plant specials building
#1394	5/18/2007	New silo and WAM Model FC3J baghouse and replacement baghouse on cement type III storage silo with additional WAM Model FC3J baghouse