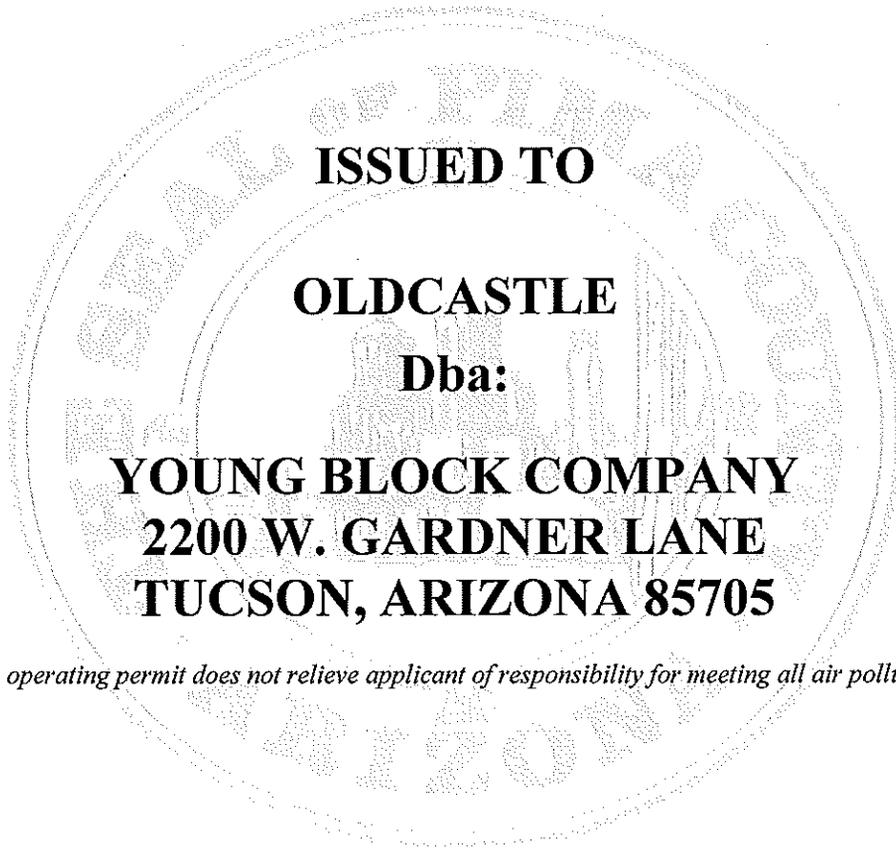


PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

33 North Stone Avenue, Suite 730, Tucson, AZ 85701, Phone: (520) 740-3340

AIR QUALITY OPERATING PERMIT

(As required by Title 17.12, Article II, Pima County Code)



ISSUED TO

OLDCASTLE

Db:

**YOUNG BLOCK COMPANY
2200 W. GARDNER LANE
TUCSON, ARIZONA 85705**

This air quality operating permit does not relieve applicant of responsibility for meeting all air pollution regulations

THIS PERMIT ISSUED SUBJECT TO THE FOLLOWING Conditions contained in Attachments 1 and 2

PDEQ PERMIT NUMBER 1319

PERMIT CLASS III

PERMIT ISSUED JANUARY 8, 2008

EXPIRATION DATE JANUARY 7, 2013


SIGNATURE

Teresa Sobolewski Air Program Manager, PDEQ
TITLE

Oldcastle dba Young Block Company
Air Quality Permit # 1319

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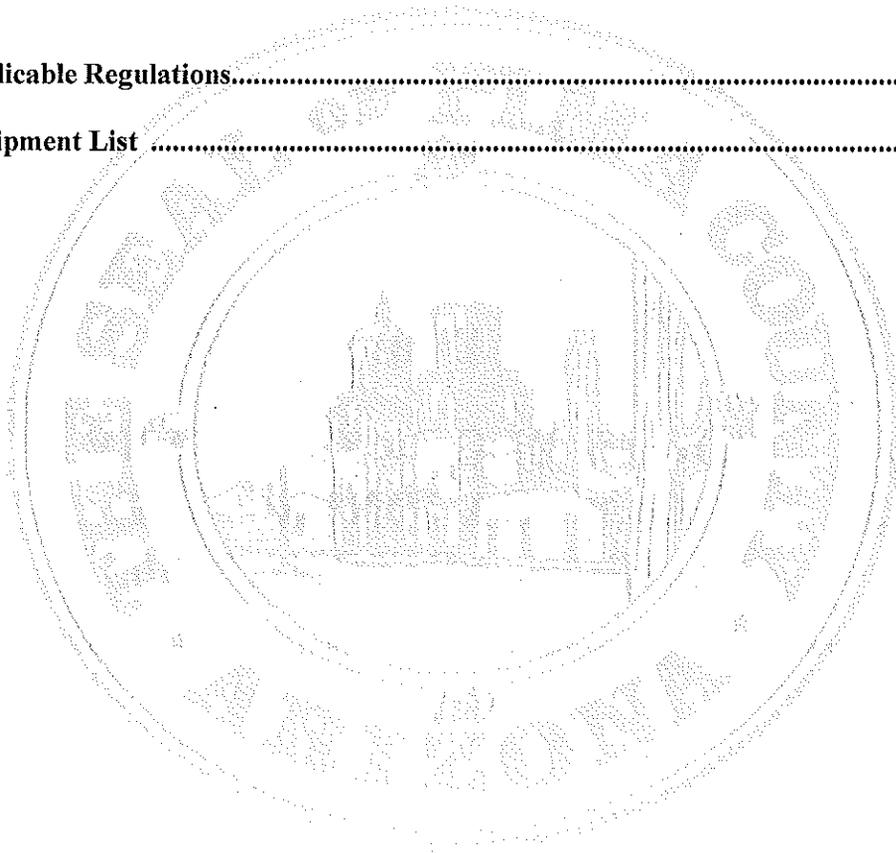
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**Oldcastle dba Young Block Company
Air Quality Permit # 1319**

Permit Summary

This operating permit is the second 5-year air quality permit issued to Oldcastle dba Young Block Company, the Permittee, for their concrete block manufacturing plant. This facility is a Class III, True Minor, Stationary Source.

The concrete block manufacturing plant utilizes the following emission sources; conveyor belts, silos and natural gas fired kilns. No NSPS or MACT standards are applicable to the facility.

The following emission rates are for reference purposes only and are not intended to be enforced by direct measurement unless otherwise noted in Attachment 2 of the Specific Conditions.

Source	Controlled Emissions (Tons/yr)					
	NO _x	CO	SO _x	PM ₁₀	VOC	HAPs
Facility-Wide	3.01	2.52	<0.1	1.33	0.17	<0.1



**Oldcastle dba Young Block Company
Air Quality Permit # 1319**

Specific Conditions

[References are to Title 17 of the Pima County Code unless otherwise noted]

I. Applicability

The facility covered by the Specific Conditions constitutes a *Class III, Stationary, True Minor Source* based on 8760 hours per year of operation and considering emissions from other emission units of the same SIC Code at this facility.

The Specific Conditions address the following emission source categories:

- A. Materials Processing [Sand, Gravel, Portland Cement]
- B. Fuel Burning Equipment [Natural Gas Fired Kiins]
- C. Facility-Wide Operations

II. Emission Limits & Standards

A. Material Processing

The provisions of this section are applicable to the effected equipment identified in Table 1 of Attachment 2.

1. Visibility Limiting Standard

- a. The Permittee shall not cause, suffer, allow or permit operations or activities likely to result in excessive amounts of airborne dust without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. [PCC 17.16.050.A]
- b. The Permittee shall not cause, suffer, allow, or permit diffusion of visible emissions, including fugitive dust, beyond the property boundary line within which the emissions become airborne, without taking reasonably necessary and feasible precautions to control generation of airborne particulate matter. Sources may be required to cease temporarily the activity of operation which is causing or contributing to the emissions until reasonably necessary and feasible precautions are taken. [PCC 17.16.050.D]
- i. The provisions of II.A1.a. & b. of the Specific Conditions do not apply when naturally induced wind speed exceed (25) miles per hour as estimated by a certified visible emissions evaluator using the Beaufort Scale of Wind-Speed equivalents, or as recorded by a U.S. weather Bureau Station or a U.S. government military installation. This exception does not apply if control measures have not been taken or were not commensurate with the size or scope of the emission source. [PCC 17.16.050.D.2]
- ii. This subsection shall not apply to undisturbed land. [PCC 17.16.050.D.3]

2. Pollution Control Requirement

- a. The Permittee shall install and operate baghouses on all pneumatically loaded silos according to manufacturer's recommendations and specifications. [PCC 17.12.185.A.2]
[Material Permit Condition]
- b. The Permittee shall not cause, suffer, allow, or permit crushing, screening, handling, transporting or conveying of materials or other operations likely to result in significant amounts of airborne dust without taking reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods to prevent excessive amounts of particulate matter from becoming airborne. [PCC 17.16.100.A]
[Material Permit Condition]
- c. The facility shall utilize spray bar pollution controls in accordance with "EPA Control of Air Emissions From Process Operations In The Rock Crushing Industry" (EPA 340/1-79-002), "Wet Suppression System" (pages 15-34), amended as of January, 1979 (and no future amendments or editions), as incorporated herein by reference and on file with the Office of the Secretary of State, with placement of spray bars and nozzles as required by the Control Officer to minimize air pollution. [PCC 17.16.370.D]
[Material Permit Condition]

3. Fugitive Emissions Standards

- a. The Permittee is responsible for controlling windblown dust, dust from haul roads, and dust emitted from land clearing, earthmoving, demolition, trenching, blasting, road construction, mining, racing event, and other activities, as applicable. [PCC 17.16.060.A]
- b. Until the area becomes permanently stabilized by paving, landscaping or otherwise, dust emissions shall be controlled by applying adequate amounts of water, chemical stabilizer, or other effective dust suppressant. [PCC 17.16.060.A.1]
- c. The Permittee shall not leave land in such a state that fugitive dust emissions (including windblown dust or dust caused by vehicular traffic on the area) would violate PCC 17.16.050. [PCC 17.16.060.A.2]
- d. Dust emissions from the transportation of materials shall be effectively controlled by covering stock loads in open-bodied trucks, limiting vehicular speeds, or other equivalently effective controls. [PCC 17.16.100.C]
- e. The Permittee shall not cause, suffer, allow, or permit organic or inorganic dust producing material to be stacked, piled or otherwise stored without taking reasonable precautions such as chemical stabilization, wetting, or covering to prevent excessive amounts of particulate matter from becoming airborne. [PCC 17.16.110.A]

4. Opacity Standard

The Permittee shall not cause or permit the effluent from a single emission point, multiple emission point, or a fugitive emissions source to have an average optical density equal to or greater than 20 percent as measured as determined by EPA Test Reference Method 9, Appendix A in 40 CFR 60. [PCC 17.16.040]

B. Fuel Burning Equipment

The provisions of this section are applicable to the effected equipment identified in Table 2 of Attachment 2.

1. Opacity Limitation

The Permittee shall not cause, allow or permit the effluent from any kiln to have an average optical density equal to or greater than 20 percent opacity. [PCC 17.16.040]

2. Fuel Limitation

The Permittee shall burn only the specified fuel allowed for the kilns in Attachment 2, Table 2 of this permit. The Permittee shall not fire high sulfur oil ($\geq 0.90\%$ by weight).

[PCC 17.12.185.A.2 & PCC 17.16.165.G]

[Material Permit Condition]

C. Facility-Wide Operations

The provisions of this section are applicable to all other permit operations or activities not specifically identified in II.A and II.B of the Specific Conditions.

1. Air Pollution Control Equipment

Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the owner or operator thereof to a degree that will adequately reduce or eliminate the discharge of air pollution to adjoining property. [PCC 17.16.020.B]

2. Concealment of Emissions

No person shall construct, install, erect, use, replace, modify, or operate an emission source so as to conceal an emission which would otherwise be a violation of a control standard established herein. Concealment shall include: [PCC 17.20.040]

- a. The use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere;
- b. Operating in a piecemeal fashion to avoid compliance with a standard that would otherwise apply to the source on the basis of its size; and
- c. Operating in a manner, under conditions, or during such times that emissions cannot be observed.

3. Local rules and standards - applicability of more than one standard

If more than one emission limit or emission standard is applicable to the same source, the more stringent standard or emission limit shall apply. [PCC 17.16.010.B]

4. Facility Changes

[PCC 17.12.185.A.2]

Before installing additional units, modifying existing emission equipment or switching fuels, the Permittee shall apply for the appropriate revision pursuant to PCC 17.12.240, PCC 17.12.255 or PCC 17.12.260.

III. Monitoring Requirements

[PCC 17.12.185.A.3]

A. Material Processing

The provisions of this section are applicable to the effected equipment identified in Table 1 of Attachment 2.

1. To assure compliance with the opacity limitation in II.A.1 and II.A.4 of the Specific Conditions, the Permittee shall observe all point and non point sources at least once per shift during operations for evidence of abnormal emissions. If the observer sees a plume that, on an instantaneous basis, appears to exceed 20 percent or the plume is crossing property boundaries, then the Permittee shall, if practicable, take a visible emissions observation in accordance with EPA Reference Method 9, Appendix A in 40 CFR 60. If the emissions are 20 percent or more, this shall be recorded and reported as an excess emission and a permit deviation.
2. The Permittee shall examine the condition of the bags and baghouse each time maintenance is performed. Baghouse filters shall be checked to ensure they are maintained according to the manufacturer's recommendations and specifications.
3. To assure compliance with the fugitive emissions standards in II.A.3 of the Specific Conditions, the Permittee shall observe non point sources at least once per shift during operations for evidence of abnormal emissions. If the observer sees a plume that is crossing property boundaries, then the Permittee shall report and record this occurrence as a excess emissions and a permit deviation.

B. Fuel Burning Equipment

The provisions of this section are applicable to the effected equipment identified in Table 2, Attachment 2 of the Specific Conditions.

1. In order to demonstrate compliance with the opacity limitation in II.B.1 of the Specific Conditions, the Permittee shall conduct a visible emissions check on the exhaust stack of each kiln at least quarterly while the kilns are operating. For the purposes of this permit, a visible emissions check is verification that abnormal emissions are not present at the kiln stack. If the observer sees a plume that, on an instantaneous basis, appears to exceed 20% or the plume is crossing property boundaries, then the Permittee shall, if practicable, take a visible emissions observation in accordance with EPA Reference Method 9, Appendix A in 40 CFR 60. If the emissions are 20% or more, this shall be recorded and reported as an excess emission and a permit deviation.
2. The Permittee shall be considered in compliance with the fuel limitation standard in II.B.2 of the Specific Conditions by demonstrating that only commercially available pipeline quality natural gas fuel was fired in the kilns listed in Table 2 of Attachment 2. Such a demonstration may be by actual inspection of the equipment showing that pipeline natural gas is the only fuel supply plumbed to the equipment for firing.

IV. Recordkeeping Requirements

[PCC 17.12.185.A.4]

A. Visible Emissions Checks

The Permittee shall record all visible emissions checks of the facility plant equipment, supporting equipment and general plant site made under the monitoring requirements in III of the Specific Conditions. Records of such checks shall include, at minimum:

1. The date and time of the check;

2. The name of the person conducting the check;
3. The particular piece of equipment or area being observed; and,
4. The results of the check to include whether abnormal emissions were observed. If no visible emissions are observed, the record shall reflect this. If excessive emissions were observed, the record shall include corrective action taken and the results of the required follow-up opacity test.

B. Retention and Location of Records

The Permittee shall retain all records relating to this permit, retain a copy of the permit at the permit site and comply with the permit posting requirements. All records required by this permit shall be retained for at least five years. [PCC 17.12.080 & PCC 17.24.020.A]

V. Reporting Requirements

[PCC 17.12.185.A.5]

Emissions Inventory Reporting

[PCC 17.12.320]

Every source subject to a permit requirement shall complete and submit to the Control Officer, when requested, an annual emissions inventory questionnaire pursuant to PCC 17.12.320.

VI. Testing Requirements

[PCC 17.12.050, PCC 17.12.185.A.3.a & PCC 17.20.010]

For purposes of demonstrating compliance, these test methods shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any provision of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed.

A. Opacity

When required or requested by the Control Officer, the Permittee shall perform a visible emission observation in accordance with EPA Reference Method 9, Appendix A in 40 CFR 60 to monitor compliance with the specified visibility and opacity limitations of the Specific Conditions.

[PCC 17.12.040.B & PCC 17.12.180.A.3]

B. Fuel Limitation

The Permittee need only demonstrate that pipeline quality natural gas was fired exclusively since the sulfur content of pipeline quality natural gas is regulated by the Federal Energy Regulatory Commission.

C. Alternative Test Method

The Permittee may submit an alternate and equivalent test method(s) that is listed in 40 CFR Subpart 60, Appendix A, to the Director in a test plan, for approval by the Director. [PCC 17.12.045.D]

ADDITIONAL PERMIT REQUIREMENTS

I. COMPLIANCE WITH PERMIT CONDITIONS

[PCC 17.12.185.A.7.a & b]

- A. The Permittee shall comply with all conditions of this permit including all applicable requirements of Arizona air quality statutes and the air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
- B. The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. The report shall be in 2 parts as specified below: [PCC 17.12.185.A.5 & PCC 17.12.040]
 - 1. Notification by telephone or facsimile within 24 hours of the time the Permittee first learned of the occurrence of excess emission that includes all available information from 17.12.040.B. The number to report excess emissions is **520-740-3340**. The facsimile number is **520-882-7709**.
 - 2. Detailed written notification by submission of an excess emissions report within 72 hours of the notification under I.B.1 above. **Send to PDEQ 150 W. Congress St., Tucson, Arizona 85701.**
- C. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- D. The permit does not convey any property rights of any sort, or any exclusive privilege to the permit holder.
- E. The Permittee shall pay fees to the Control Officer pursuant to PCC 17.12.510. [PCC 17.12.185.A.9 & PCC 17.12.510]

II. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE

[PCC 17.12.185.A.7.c]

The permit may be revised, reopened, revoked and reissued, or terminated for cause pursuant to PCC 17.12.270. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

III. DUTY TO PROVIDE INFORMATION

[PCC 17.12.165.G & PCC 17.12.185.A.7.e]

- A. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records to the Control Officer along with a claim of confidentiality.
- B. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

IV. SEVERABILITY CLAUSE

[PCC 17.12.185.A.6]

The provisions of this permit are severable. If any provision of this permit is held invalid, the remainder of this permit shall not be affected thereby.

Oldcastle dba Young Block Company
Air Quality Permit # 1319

Attachment 1: Applicable Regulations

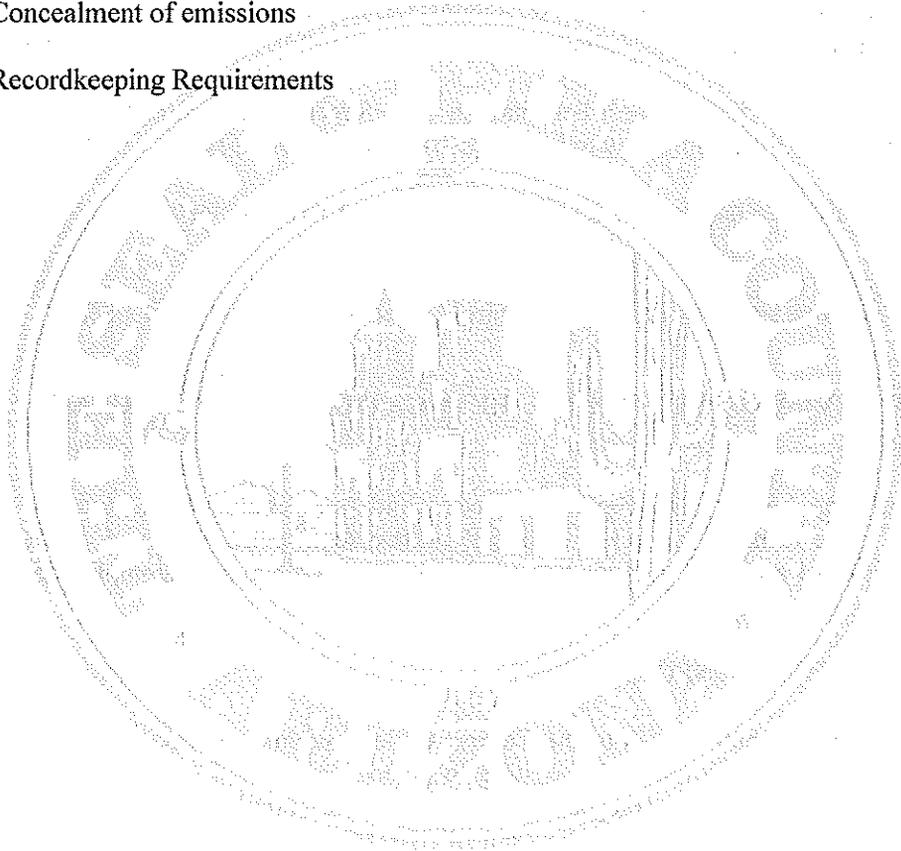
Requirements Specifically Identified as Applicable:

Pima County Code (PCC) Title 17

- 17.16.050 Visibility limiting standard
- 17.16.060 Fugitive dust producing activities
- 17.16.100 Particulate materials
- 17.16.110 Storage Piles
- 17.16.165 Standards of performance for fossil-fuel fired industrial and commercial equipment
- 17.16.370 Standards of performance for gravel or crushed stone processing plants

- 17.20.010 Source Sampling, Monitoring, and Testing
- 17.20.040 Concealment of emissions

- 17.24.020 Recordkeeping Requirements



Oldcastle dba Young Block Company
Air Quality Permit # 1319

Attachment 2: Equipment List

TABLE 1: Material Processing Equipment

Type of Equipment	Capacity	Make	Model	Serial Number	Date of Manufacture	Emission Point Number (EPN)	Equipment ID Number
105' x 24'' Conveyor Belts (3)	10 Tons/Hr	Young Block	N/A	N/A	Pre-70's	EPN: 5, 6, 7	101, 102, 103
65' x 24'' Conveyor Belts (10)	10 Tons/Hr	Young Block	N/A	N/A	Pre-70's	None	104 through 113
Cement Silo With Baghouse	94 Tons	Stephens	N/A	N/A	Pre-70's	EPN: 8	114
Cement Silo With Baghouse	66 Tons	Young Block	N/A	N/A	Pre-70's	EPN: 9	115
Cement Block Conveyor (2)	45,688 lb/hr	Young Block	N/A	N/A	Pre-70's	None	116, 117
Cement Mixer #1	12 cu yd/hr	Odell	N/A	SN 50-13-39	Unknown	EPN: 10	118
Cement Mixer #2	12 cu yd/hr	Columbia	N/A	SN 508-5	Unknown	EPN: 11	119
Cement Mixer #3	22.5 cu yd/hr	Young Block	N/A	SN 308-443-1-5	Unknown	EPN: 12	120
Conveyor Belt #1	36,700 lb/hr	Young Block	N/A	N/A	Pre-70's	None	121
Block Machine #1	10 cu yd/hr	Columbia	N/A	SN 183-16A-6	Unknown	None	123
Block Machine #2	11 cu yd/hr	Columbia	N/A	SN 16HF-3A-6	Unknown	None	124
Block Machine #3	20 cu yd/hr	Columbia	N/A	SN 484-3-1-14	Unknown	None	125

N/A : Not Applicable : Appropriate equipment identification numbers are provided where necessary for in-house built equipment.

Oldcastle dba Young Block Company
 Air Quality Permit # 1319

Equipment List Continued

TABLE 2: Fuel Burning Equipment (Natural Gas Fired)

Type of Equipment	Capacity	Make	Model	Serial Number	Date of Manufacture	Allowable Fuel	Emission Point Number (EPN)	Equipment ID Number
Heater for Kilns (2)	3.5 MMBTU	Kraft	Vapor Generator VS Series KE-35	None Available	2006	Natural Gas	EPN: 13,14	126

