

REC'D 11/28/18



COLORADO
Department of Public
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

**CONSTRUCTION PERMIT
FINAL APPROVAL TO OPERATE**

Issue Date: November 28, 2018

Ralph Bell
Castle Rock Construction Company of Colorado, LLC
6374 S. Racine Circle
Centennial, CO 80111
rbell@crccllc.com

Mr. Bell:

The Air Pollution Control Division (Division) reviewed and approved the information supplied with the self-certification for the construction permit listed below. Through this letter, you are issued this final approval to operate under the terms and conditions of the permit. **This final approval to operate letter is valid upon issuance and a copy shall be maintained with the associated permit to demonstrate self-certification is complete.** This letter shall be made available to the Division for inspection upon request.

Company Name:	Castle Rock Construction Company of Colorado, LLC		
Source Name:	Q150 Rex, Model: S concrete batch plant		
Source Location:	Home based: 6374 South Racine Circle, Centennial, Arapahoe County, Colorado		
Make:	Model:	Serial #:	

Permit Number:	18PO0050	Issuance 1
AIRS ID:	777/4364/001	

If required by the permit, the source shall operate in compliance with the most recently approved Operating and Maintenance Plan.

If you have any questions about this approval letter, please contact the Division at 303-692-3189.

Sincerely,

Doug Ryder
Final Approval Coordinator
Air Pollution Control Division





Colorado Department of Public Health and Environment

Air Pollution Control Division

Permit Processing Fee Invoice

CUSTOMER NUMBER	BILLING DATE	DUE DATE	INVOICE NUMBER
9920106830	11/28/2018	12/28/2018	202051616

ATTN: RALPH BELL
CASTLE ROCK CONSTRUCTION CO. OF COLO. LLC
6374 S RACINE CIRCLE
CENTENNIAL, CO 80111

Permit/Application: **18PO0050**

Pursuant to the provisions set forth in the Colorado Air Pollution Prevention and Control Act, The following Fees for processing, administration and/or enforcement regarding the Air Pollution emission permit/application specified above are due. Other itemized fees may also be included.

Note: A rate increase became effective 7/1/2018. Permit processing time incurred prior to this date will be assessed under the old rate while processing time incurred after this date will be assessed under the new rate.

Plant Name: CASTLE ROCK CONST - Q150 PLANT, PORT CBP

Plant Location: I-25 & CO-470 (SE CORNER)

Source Description: Q150 PLANT
PORTABLE CONCRETE BATCH PLANT

Description of Charges	Amount
Final Approval	\$324.90
APEN Fees	
Public Notice Fees	
Credits/Debits	
Current Charges:	\$324.90

For questions regarding this invoice, please call:

- 1) E-mail: cdphe_apcd_invoice_questions@state.co.us
- 2) (303) 692-3210 Air Pollution Control Division Hotline
- 3) (800) 886-7689 ext. 3210 Air Pollution Control Division Hotline - In state long distance

Please return this lower portion with your payment. Failure to do so may result in your payment being improperly credited to your account.
Please see reverse for address corrections.

9920106830-202051616 \$324.90

RALPH BELL
CASTLE ROCK CONSTRUCTION CO. OF COLO. LLC
6374 S RACINE CIRCLE
CENTENNIAL, CO 80111

Instructions:

Make Checks Payable To:

Colorado Department of Public Health and Environment

Remit Payment To:

Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
ASD-AR-B1
Denver, CO 80246-1530

PAY ONLINE NOW

Accepting eCheck, Debit and Credit Cards

Payment Fees:

eCheck (fee \$1.00)

Debit Card (fee \$.75 + 2.75%)

All major Credit Cards (fee \$.75 + 2.75%)

www.colorado.gov/cdphe/payinvoice

For questions, please email: cdphe_apcd_invoice_questions@state.co.us

Q150 EMAILED 11/19/18

Form APCD-400



Air Pollution Control Division Stationary Sources Program

AIR POLLUTION CONTROL DIVISION CONSTRUCTION PERMIT FINAL APPROVAL SELF-CERTIFICATION FORM

Company Name: [redacted] Castle Rock Construction Company of Colorado, LLC

Source Name¹: [redacted] Q150 Plant

Source AIRS ID²: [redacted] 777/4364/001

Permit Number: [redacted] 18PO0050 **Permit Issuance Date:** [redacted] October 5, 2018

All information related to the Final Approval certification of the above referenced construction permit must be certified by a responsible official as defined in the attached memo. This certification means that each condition of the construction permit has been reviewed and that the source is in compliance with all conditions of the permit. A Final Approval Letter will be issued only if all permit conditions are being met. The attached memo provides guidance on what steps must be taken to certify compliance with various types of permit conditions. This signed certification for the request for Final Approval must be submitted with all supporting documentation of compliance (i.e. test results, etc) required by the permit. A separate Certification along with the associated documentation is required for each individual issued permit.

I have reviewed the above paragraph, the attached document entitled "Guidance for Self-Certification", terms and conditions of the construction permit referenced above, and the information being submitted for Final Approval of this permit in its entirety. Based on information and belief formed after reasonable inquiry, I certify that the source is in full compliance with the permit and each condition of this construction permit, and the statements and information contained in this submittal are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in § 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this application is guilty of a misdemeanor and may be punished in accordance with the provisions of § 25-7 122.1, C.R.S.

[redacted] Ralph Bell [redacted] CEO
 Printed or Typed Name Title

[redacted] *Ralph Bell* [redacted] November 19, 2018
 Signature Date Signed

Footnotes:

- ¹ Source name is how the company references the facility and is described in the permit (i.e. Little Creek Compressor Station).
- ² Source AIRS ID is the ten-digit identification number issued by the APCD for the emissions source (i.e: 123/3456/001). This may be found on the front page and/or in the lower left hand corner of the permit.



Rec'd
10/6/18

CONSTRUCTION PERMIT

Permit number: **18PO0050**

Issuance: **1**

Date issued: October 5, 2018

Issued to: **Castle Rock Construction Compan of Colorado, LLC**

Facility Name: Q150 Plant
Plant AIRS ID: 777/4364
Physical Location: Home Based at 6374 South Racine, Centennial
County: Arapahoe
General Description: Concrete production facility

Equipment or activity subject to this permit:

Facility Equipment ID	AIRS Point	Description
Q150	001	Central Mix Concrete Plant Make: Rex, Model: S, Serial: 2081 Design rated at 400 cubic yards per hour Controlled with Baghouse(s)

THIS PERMIT IS GRANTED SUBJECT TO ALL RULES AND REGULATIONS OF THE COLORADO AIR QUALITY CONTROL COMMISSION AND THE COLORADO AIR POLLUTION PREVENTION AND CONTROL ACT C.R.S. (25-7-101 et seq), TO THOSE GENERAL TERMS AND CONDITIONS INCLUDED IN THIS DOCUMENT AND THE FOLLOWING SPECIFIC TERMS AND CONDITIONS:

REQUIREMENTS TO SELF-CERTIFY FOR FINAL APPROVAL

1. Point 001: YOU MUST notify the Air Pollution Control Division (Division) no later than fifteen days after commencement of operation under this permit by submitting a Notice of Startup (NOS) form to the Division. The Notice of Startup (NOS) form may be downloaded online at <https://www.colorado.gov/pacific/cdphe/other-air-permitting-notices>. Failure to notify the Division of startup of the permitted source is a violation of AQCC Regulation Number 3, Part B, III.G.1 and can result in the revocation of the permit.
2. Within one hundred and eighty days (180) after commencement of operation or issuance of this permit, whichever is later, compliance with the conditions contained on this permit must be demonstrated to the Division. It is the permittee's responsibility to self certify compliance with



the conditions. Failure to demonstrate compliance within 180 days may result in revocation of the permit or enforcement action by the Division. Information on how to certify compliance was mailed with the permit or can be obtained from the Division's website at <https://www.colorado.gov/pacific/cdphe/air-permit-self-certification>. (Reference: Regulation Number 3, Part B, III.G.2).

3. This permit will expire if the owner or operator of the source for which this permit was issued: (i) does not commence construction/modification or operation of this source within 18 months after either, the date of issuance of this construction permit or the date on which such construction or activity was scheduled to commence as set forth in the permit application associated with this permit; (ii) discontinues construction for a period of eighteen months or more; (iii) does not complete construction within a reasonable time of the estimated completion date. The Division may grant extensions of the deadline per Regulation Number 3, Part B, III.F.4.b. (Reference: Regulation Number 3, Part B, III.F.4.)
4. Point 001: Within one hundred and eighty days (180) after commencement of operation or issuance of this permit, whichever is later, the operator must complete all initial compliance testing and sampling as required in this permit and submit the results to the Division as part of the self-certification process. (Reference: Regulation Number 3, Part B, III.G.2.)
5. Within thirty (30) days after commencement of operation or issuance of this permit, whichever is later, the permit number must be marked on the subject equipment for ease of identification. (Reference: Regulation Number 3, Part B, III.E.) (State only enforceable)

EMISSION LIMITATIONS AND RECORDS

6. Emissions of air pollutants must not exceed the following limitations (as calculated using the emission factors included in the Notes to Permit Holder section of this permit). (Reference: Regulation Number 3, Part B, II.A.4)

Annual Limits:

Facility Equipment ID	AIRS Point	Tons per Year							Emission Type
		PM	PM ₁₀	PM _{2.5}	NO _x	SO ₂	VOC	CO	
Q150	001	3.8	1.8	1.8					Point
		13.7	5.0	0.7					Fugitive

See "Notes to Permit Holder" for information on emission factors and methods used to calculate limits.

In the absence of credible evidence to the contrary, compliance with the fugitive emission limits is demonstrated by complying with the production limits listed below and by following the attached particulate emissions control plan.

Note: Compliance with the point emission limits must be demonstrated by not exceeding the production limits listed below and by proper operation and maintenance of the emission control equipment listed below.

7. The emission points in the table below must be maintained and operated with the control equipment as listed. The emission control devices must be inspected, monitored, maintained / renewed, and operated as per the manufacturers' recommendations, or maintained in accordance with good air pollution control practices to ensure the satisfactory performance of the devices. (Reference: Regulation Number 3, Part B, III.E.)

Facility Equipment ID	AIRS Point	Control Device	Controlled Pollutants
Q150	001	Baghouse(s)	PM

PROCESS LIMITATIONS AND RECORDS

8. This source must be limited to the following maximum consumption, processing and/or operational rates as listed below. Annual and Daily records of the actual process rate must be maintained by the applicant and made available to the Division for inspection upon request. (Reference: Regulation Number 3, Part B, II.A.4)

Process/Consumption Limits

AIRS Point	Process Parameter	Annual Limit	Daily Limit
001	Production of concrete	10,000 yd ³	2415 yd ³

STATE REGULATORY REQUIREMENTS

9. Visible emissions must not exceed twenty percent (20%) opacity during normal operation of the source. During periods of startup, process modification, or adjustment of control equipment visible emissions must not exceed 30% opacity for more than six minutes in any sixty consecutive minutes. Opacity must be determined using EPA Method 9. (Reference: Regulation Number 1, II.A.1. & 4.)
10. This source is subject to the odor requirements of Regulation Number 2. (State only enforceable)
11. When relocating this equipment the owner or operator must (Reference: Regulation Number 3, Part A, Section II.C.1.f and Part B, III.E.):
- a. Submit a Relocation Notice each time this equipment is moved to a new location. The Relocation Notice must be received by the Division at least ten (10) days prior to the change in location.

The Relocation Notice must include a facility emission inventory that includes all emission units at the new location. An ambient air quality impact analysis for the site must be submitted with the Relocation Notice for this equipment if so requested by the Division.
 - b. Maintain records of compliance with all additional requirements that are triggered by the relocation. Such requirements may include, but are not limited to:
 - (1) State or Federal New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), Maximum Achievable Control Technology (MACT), and Generally Available Control Technology (GACT) requirements; and
 - (2) Major source requirements, including Title V Operating Permit, Nonattainment Area New Source Review (NANSR) and Prevention of Significant Deterioration (PSD) program requirements; and

- (3) Permitting requirements for sources no longer permit exempt due to the relocation of this unit to the site (i.e. previously Air Pollutant Emission Notice (APEN) required, permit exempt sources).
- c. Keep a record of all relocation notices submitted to the Division.
- 12. This unit must not remain at any one site for more than two (2) years. Permittee must keep records of time spent at each site (Reference: Regulation Number 3, Part A, I.B.36.). If this unit remains at a site for two years then the permittee must submit a revised Air Pollutant Emission Notice (APEN) requesting a permit as a non-portable stationary source.
 - 13. If this source relocates to a site causing the facility to become Title V Operating Permit major (see Regulation Number 3, Part A, I.B.25.) or relocates to an existing Title V Permitted source then this source is subject to the provisions of Regulation Number 3, Part C, Operating Permits (Title V of the 1990 Federal Clean Air Act Amendments). The application for the Operating Permit, or modification for inclusion in the existing Operating Permit, is due within one year of the date of commencement of operation at the site.
 - 14. The particulate emission control measures listed on the attached page (as approved by the Division) must be applied to the particulate emission producing sources as required by Regulation Number 1, III.D.1.b.

OPERATING & MAINTENANCE REQUIREMENTS

- 15. This source is not required to follow a Division-approved operating and maintenance plan. The source must follow the manufacturer's operating and maintenance recommendations or must follow good air pollution control practices.

COMPLIANCE TESTING AND SAMPLING

Initial Testing Requirements

- 16. Within 180 days of startup, the owner or operator must demonstrate compliance with Condition 9, using EPA Method 9 to measure opacity from the mix area. This measurement must consist of a minimum twenty-four consecutive readings taken at fifteen second intervals over a six minute period. (Reference: Regulation Number 1, Section II.A.1 & 4)

Periodic Testing Requirements

- 17. There are no periodic testing requirements for this source.

ADDITIONAL REQUIREMENTS

- 18. The permit number must be marked on the subject equipment for ease of identification. (Reference: Regulation Number 3, Part B, III.E.) (State only enforceable)
- 19. A Revised Air Pollutant Emission Notice (APEN) must be filed: (Reference: Regulation Number 3, Part A, II.C.)
 - a. By April 30 of the year following a significant increase in emissions. A significant increase in emissions is defined as follows:

For any criteria pollutant:

For sources emitting **less than 100 tons per year**, a change in actual emissions of five tons per year or more, above the level reported on the last APEN submitted; or

For volatile organic compounds (VOC) and nitrogen oxide (NOx) sources in an ozone non-attainment area emitting **less than 100 tons of VOC or nitrogen oxide per year**, a change in actual emissions of one ton per year or more or five percent, whichever is greater, above the level reported on the last APEN submitted; or

For sources emitting **100 tons per year or more of a criteria pollutant**, a change in actual emissions of five percent or 50 tons per year or more, whichever is less, above the level reported on the last APEN submitted; or

For sources emitting **any amount of lead**, a change in actual emissions, above the level reported on the last APEN submitted, of fifty (50) pounds of lead

For any non-criteria reportable pollutant:

If the emissions increase by 50% or five (5) tons per year, whichever is less, above the level reported on the last APEN submitted to the Division.

- b. Whenever there is a change in the owner or operator of any facility, process, or activity; or
- c. Whenever new control equipment is installed, or whenever a different type of control equipment replaces an existing type of control equipment; or
- d. Whenever a permit limitation must be modified; or
- e. No later than 30 days before the existing APEN expires.

GENERAL TERMS AND CONDITIONS:

- 20. This permit and any attachments must be retained and made available for inspection upon request. The permit may be reissued to a new owner by the Division as provided in Regulation Number 3, Part B, II.B upon a request for transfer of ownership and the submittal of a revised APEN and the required fee.
- 21. If this permit specifically states that final approval has been granted, then the remainder of this condition is not applicable. Otherwise, the issuance of this construction permit is considered initial approval and does not provide "final" approval for this activity or operation of this source. Final approval of the permit must be secured from the APCD in writing in accordance with the provisions of 25-7-114.5(12)(a) C.R.S. and AQCC Regulation Number 3, Part B, III.G. Final approval cannot be granted until the operation or activity commences and has been verified by the APCD as conforming in all respects with the conditions of the permit. Once self-certification of all points has been reviewed and approved by the Division, it will provide written documentation of such final approval. **Details for obtaining final approval to operate are located in the Requirements to Self-Certify for Final Approval section of this permit.** The operator must retain the permit final approval letter issued by the Division after completion of self-certification with the most current construction permit.
- 22. This permit is issued in reliance upon the accuracy and completeness of information supplied by the applicant and is conditioned upon conduct of the activity, or construction, installation and operation of the source, in accordance with this information and with representations made by the applicant or applicant's agents. It is valid only for the equipment and operations or activity(ies) specifically identified in this permit. If subsequent operations or testing at the



source indicate the information supplied to obtain this permit and relied upon in the creation and issuance of this permit is inaccurate, the source must submit an application to modify the permit to address the inaccuracy(ies). (Reference: Regulation Number 3, Part B III.E.)

By: Aaron Moseley
 Aaron Moseley
 Permit Engineer

Permit History

Issuance	Date	Description
Issuance #1	This Issuance	Initial Approval issued to Castle Rock Construction Company of Colorado, LLC.

Notes to Permit Holder (as of date of permit issuance):

- 1) The production or raw material processing limits and emission limits contained in this permit are based on the production/processing rates requested in the permit application. These limits may be revised upon request of the permittee providing there is no exceedence of any specific emission control regulation or any ambient air quality standard. A revised air pollutant emission notice (APEN) and application form must be submitted with a request for a permit revision. (Reference: Regulation Number 3, Part B II.A.4.)
- 2) This source is subject to the Common Provisions Regulation Part II, Subpart E, Affirmative Defense Provision for Excess Emissions During Malfunctions. The permittee must notify the Division of any malfunction condition which causes a violation of any emission limit or limits stated in this permit as soon as possible, but no later than noon of the next working day, followed by written notice to the Division addressing all of the criteria set forth in Part II.E.1. of the Common Provisions Regulation. See: <https://www.colorado.gov/pacific/cdphe/aqcc-regs>.
- 3) The emission levels contained in this permit are based on the following emission factors:

Point 001:

Pollutant	Emission Factors (lbs/yd ³)		
	Uncontrolled	Controlled	Source
PM	0.0611	0.0189	Division
PM ₁₀	0.0236	0.0090	Division
PM _{2.5}	0.0118	0.0087	Division
fugitive PM	0.8426	0.0682	Division
fugitive PM ₁₀	0.2417	0.0249	Division
fugitive PM _{2.5}	0.0269	0.0032	Division

- 4) In accordance with C.R.S. 25-7-114.1, each Air Pollutant Emission Notice (APEN) associated with this permit is valid for a term of five years from the date it was received by the Division. A revised APEN must be submitted no later than 30 days before the five-year term expires. Please refer to the most recent annual fee invoice to determine the APEN expiration date for

each emissions point associated with this permit. For any questions regarding a specific expiration date call the Division at (303)-692-3150.

5) This facility is classified as follows:

Applicable Requirement	Status
Operating Permit	Minor Source PM
PSD	Minor Source PM
NANSR	Minor Source PM

- 6) The permit holder is required to pay fees for the processing time for this permit. An invoice for these fees will be issued after the permit is issued. Failure to pay the invoice will result in revocation of this permit. The permit holder must pay the invoice within 30 days of receipt of the invoice (Reference: Regulation Number 3, Part A, VI.B.).
- 7) Unless specifically stated otherwise, the general and specific conditions contained in this permit have been determined by the Division to be necessary to assure compliance with the provisions of Section 25-7-114.5(7)(a), C.R.S.
- 8) Each and every condition of this permit is a material part hereof and is not severable. Any challenge to or appeal of a condition hereof must constitute a rejection of the entire permit and upon such occurrence, this permit must be deemed denied *ab initio*. This permit may be revoked at any time prior to self-certification and final authorization by the Division on grounds set forth in the Colorado Air Pollution Prevention and Control Act and regulations of the AQCC including failure to meet any express term or condition of the permit. If the Division denies a permit, conditions imposed upon a permit are contested by the applicant, or the Division revokes a permit, the applicant or owner or operator of a source may request a hearing before the AQCC for review of the Division's action. (Reference: Regulation Number 3, Part B III.F.)
- 9) Section 25-7-114.7(2)(a), C.R.S. requires that all sources required to file an Air Pollutant Emission Notice (APEN) must **pay an annual emission fee**. If a source or activity is to be discontinued, the owner must notify the Division in writing requesting a cancellation of the permit. Upon notification, annual fee billing will terminate.
- 10) Violation of the terms of a permit or of the provisions of the Colorado Air Pollution Prevention and Control Act or the regulations of the AQCC may result in administrative, civil or criminal enforcement actions under Sections 25-7-115 (enforcement), -121 (injunctions), -122 (civil penalties), -122.1 (criminal penalties), C.R.S.

PARTICULATE EMISSIONS CONTROL PLAN FOR MATERIAL PROCESSING ACTIVITIES

THE FOLLOWING PARTICULATE EMISSIONS CONTROL MEASURES MUST BE USED FOR COMPLIANCE PURPOSES ON THE ACTIVITIES COVERED BY THIS PERMIT, AS REQUIRED BY THE AIR QUALITY CONTROL COMMISSION REGULATION NUMBER 1, III.D.1.b. THIS SOURCE IS SUBJECT TO THE FOLLOWING EMISSION GUIDELINES:

- a. **Processing Activities** - Visible emissions not to exceed 20% opacity, no off-property transport of visible emissions.
- b. **Haul Roads** - No off-property transport of visible emissions must apply to on-site haul roads, the nuisance guidelines must apply to off-site haul roads.
- c. **Haul Trucks** - There must be no off-property transport of visible emissions from haul trucks when operating on the property of the owner or operator. There must be no off-vehicle transport of visible emissions from the material in the haul trucks when operating off of the property of the owner or operator.

Control Measures

1. Material stockpiles must only use prewashed aggregate.
2. Plant entryway, truck service roads, and concrete batching areas must be watered at least 3 times per day/
3. Vehicle speed on unpaved roads must be restricted to 5 miles per hour. Speed limit signs must be posted.
4. Plant entryway, truck service roads, and concrete batching areas must be treated with chemical stabilizer per the manufactures recommendations.
5. Material stockpiles must be watered at least 3 times per day.
6. Aggregate materials must be sprayed with water during material loading into the storage bins or stockpiles.

