CATEGOR	Y:	Ма	terial Handling	
BACT Size	: Minor Source	9	Volumetric Truck Based Conc	rete/Gunite Plant
BACT Determination Numbe		er: 220	BACT Determination Date:	5/24/2019
		Equipmen	t Information	
Permit Nu	mber: 25938			
Equipmer	nt Description:	Volumetric Truck Base	ed Concrete/Gunite Plants	
	Rating/Capacity:			
Equipmer	t Location:	Triple-G-Gunite, Inc. 9200 Elder Creed Rd SACRAMENTO, CA	EXPIRED	
		BACT Determina	ation Information	
ROCs	Standard:			
	Technology Description:			
	Basis:			
NOx	Standard:			
	Technology Description:			
	Basis:			
SOx	Standard:			
	Technology Description:			
	Basis:			
PM10	Standard:			
	Technology Description:	Reference comment section.		
	Basis:	Achieved in Practice		
PM2.5	Standard: Technology Description:	Reference comment section.		
	Basis:	Achieved in Practice		
СО	Standard:			
00	Technology Description:			
	Basis:			
LEAD	Standard:			
	Technology Description:			
	Basis:			
Comment	s: T-BACT is consider	ed to be equivalent to BACT.		
	to a control device		ately wetted to prevent visible emissions > 5%. 2. in vent or equivalent). 3. Loadout screw/auger ser	
District	Contact: Felix 7	Trujillo Phone No.: (91	6) 874 - 7357 email: ftrujillo@airqu	ality.org

SACRAMENTO METROPOLITAN



BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION

	DETERMINATION NO.:	220
	DATE:	May 24, 2019
EXPIRED	ENGINEER:	Felix Trujillo, Jr.
Category/General Equip Description:	Material Handling	
Equipment Specific Description:	Volumetric Truck Based Conc	rete/Gunite Plants
Equipment Size/Rating:	Minor Source	
Previous BACT Det. No.:	None	

This BACT determination will be made for a stationary gunite and concrete operations including cement silo loading, cement loadout, sand/aggregate handling and stockpiles that only load volumetric trucks.

This BACT determination will apply to gunite/concrete plants that only use volumetric trucks. There is a difference in the plant setup depending on the type of truck that is being loaded. The standard concrete batch plant is setup to load concrete mix materials into ready-mix trucks. The ready-mix trucks have an opening at the end of the mixing drum that allows the material to be filled through the use of a loading chute. There is no way of directly loading the ready-mix truck with a front-end loader. The standard concrete batch plant also uses weigh batchers to measure the separate concrete mix materials to produce the ordered amount of concrete. Any concrete that is not used is considered waste. The standard concrete batch plant is also capable of producing gunite, since the only difference is that gunite does not include coarse aggregate. A volumetric truck consists of four compartments for water, sand, coarse aggregate and cement (see diagram below). Since, mixing takes place at the site, there is no waste of material. The loading of the sand and coarse aggregate is loaded via a front-end loader. A volumetric truck is not able to be loaded through the use of a standard concrete batch plant. Both of these types of plants would be able to produce gunite or concrete. Therefore, the same BACT should apply, whether they are doing gunite or concrete. Since they are handling the same materials and have the same exhaust streams. The BACT that applies to concrete batch plants that unload into ready-mix trucks should also apply to gunite operations that unload into ready-mix trucks, since they are using the same equipment. This would also be true for gunite and concrete operations that only load volumetric trucks. Therefore, this BACT determination will only apply to gunite and concrete operations that only load volumetric trucks.



This BACT was determined under the project for A/C 25938 (Triple-G-Gunite, Inc.).

BACT ANALYSIS

A: ACHIEVED IN PRACTICE (Rule 202, §205.1a)

The following control technologies are currently employed as BACT for stationary gunite/concrete volumetric truck loading operations :

District/Agency	Best Available Control Technology (BACT)/Requirements
US EPA	BACT Source: EPA RACT/BACT/LAER Clearinghouse The EPA BACT Clearinghouse doe not have a BACT determination for this source category. RULE REQUIREMENTS: None
ARB	BACT Source: ARB BACT Clearinghouse The ARB BACT Clearinghouse does not have a BACT for this source category. RULE REQUIREMENTS: None

BACT Determination Volumetric Truck Based Concrete/Gunite Plants Page 3 of 9

District/Agency	Best Ava	ilable Control Technology (BACT)/Requirements
		SMAQMD BACT Clearinghouse /w.airquality.org/businesses/permits-registration-programs/best- -control-technology-(bact)) BACT No. 193 (8/14/18)
	Concre	te Batch Plant
	voc	No standard
	NOx	No standard
	SOx	No standard
SMAQMD	PM10	 Sand and aggregate storage: outdoor storage piles adequately wetted to prevent visible emissions > 5% opacity. Storage silos for cement: enclosed silo vented to a control device with 99% efficiency (baghouse, bin vent or equivalent).
	PM2.5	No standard
	СО	No standard
	this BAC out. As e of this do considere	sust streams as a volumetric truck loading operation will be included from T guideline. This BACT includes the use of a baghouse for the truck load- explained in more detail under the BACT section of the SJVAPCD section ocument, the use of a baghouse for volumetric truck loading will not be ed as achieved in practice.
	Source:	SCAQMD BACT Guidelines for Non-Major Polluting Facilities, page 35.
		te Batch Plant Transit Mixed
	VOC	No standard
South Coast	NOx	No standard
AQMD	SOx	No standard
	PM10	Adequate aggregate moisture
	PM2.5	No standard
	СО	No standard
	The SCA	QMD BACT trigger level is 1 lb/day.

District/Agency	Best Ava	Best Available Control Technology (BACT)/Requirements		
South Coast AQMD	This air district does not include a specific guideline for gunite/concrete volumetric truck loading operations. But it does include a BACT for concrete batching operations. Only the applicable requirements that apply to the same equipment and exhaust streams as a volumetric truck loading operation will be included from this BACT guideline. This BACT includes the use of a baghouse for the truck loadout. As explained in more detail under the BACT section of the SJVAPCD section of this document, the use of a baghouse for volumetric truck loading will not be considered as achieved in practice.			
	BACT			
	Source: SDAPCD BACT Guideance Document page 3-9 (6/11)			
	Concre	te Batch Plant Transit Mixed		
	VOC	No standard		
	NOx	No standard		
	SOx	No standard		
San Diego County APCD	PM10	 99% efficient fabric or catridge type vent filters on silos. Sand and aggregate storage piles adequately wet to maintain a minimum moisture content of 4% by weight. 		
	PM2.5	No standard		
	со	No standard		
	truck loa operation and exha this BAC out. As e of this do considere	listrict does not include a specific guideline for gunite/concrete volumetric ding operations. But it does include a BACT for concrete batching as. Only the applicable requirements that apply to the same equipment nust streams as a volumetric truck loading operation will be included from T guideline. This BACT includes the use of a baghouse for the truck load-explained in more detail under the BACT section of the SJVAPCD section because the use of a baghouse for volumetric truck loading will not be as achieved in practice.		

BACT Determination Volumetric Truck Based Concrete/Gunite Plants Page 5 of 9

District/Agency	Best Available Control Technology (BACT)/Requirements			
		D BACT Guideline Document 49.1 < 5 cubic yards per batch (9/4/91) D BACT Guideline Document 49.2 ≥ 5 cubic yards per batch (9/4/91)		
	Concre	te Batch Plant		
	VOC	No standard		
	NOx No standard			
	SOx No standard			
Bay Area AQMD	PM10	 Water spray for aggregate storage piles. Enclosure and venting of cement handling and storage to baghouse w/≤ 0.01 gr/dscf. 		
AGINE	PM2.5	No standard		
	СО	No standard		
	truck loading operation operations. Only the a and exhaust streams a this BACT guideline. T out. As explained in m of this document, the	listrict does not include a specific guideline for gunite/concrete volumetric ding operations. But it does include a BACT for concrete batching as. Only the applicable requirements that apply to the same equipment aust streams as a volumetric truck loading operation will be included from T guideline. This BACT includes the use of a baghouse for the truck load-explained in more detail under the BACT section of the SJVAPCD section becument, the use of a baghouse for volumetric truck loading will not be ed as achieved in practice.		

BACT Determination Volumetric Truck Based Concrete/Gunite Plants Page 6 of 9

District/Agency	Best Ava	ilable Control Technology (BACT)/Requirements
	BACT Source: S	SJVUAPCD BACT Guideline 6.2.2 (7/31/2018)
	Station	ary Concrete Recycling Operation
	VOC	No standard
	NOx	No standard
	SOx	No standard
	 PM10 PM10 Dutdoor storage piles adequately wetted a) to prevent visil emissions > 5% opacity, or b) with minimum moisture cont 2% for aggregate and 4% for sand. Enclosed silo vented to a control device with 99% efficience (baghouse, bin vent or equivalent). 	
	PM2.5	No standard
	СО	No standard
San Joaquin Valley APCD	Although volumetri standard and proce difference BACT rea this BAC be enclos structure ready-mit is part of vented to silos that designed equipmen these typ compartr of a bagh under the	APCD BACT trigger level is 2 lb/day. , the SJVAPCD does not have a BACT determination for a gunite/concrete c truck loading operations, the SJVAPCD does have a BACT for a concrete batch plant. But, some of the equipment/operation is the same esses the same materials and have the same exhaust streams. The only e for gunite being that it does not include coarse aggregate. Only the quirements for the same equipment and operation will be referenced from T guideline. BACT Guideline 6.2.2 (7/31/18) requires the truck loadout to sed and served by a baghouse. The gunite operation does not have the support associated with a standard concrete batch plant used for loading x trucks. Traditional concrete batch plants include a discharge chute that a support structure that allows the addition of equipment in order to be a baghouse. The silo used for gunite operations are horizontal or vertical discharge the cement via a 6 to 10 inch diameter auger. The auger is not as a support structure. Therefore, addition of a baghouse and associated in would require an additional support structure. The standard practice for es of operations is to use flexible chutes/boots that extend into the cement nent of the truck to avoid loss of the cement product. Therefore, the use ouse is not achieved in practice for the truck loadout and will be addressed a technologically feasible section of this evaluation.
	RULE RE None	<u>EQUIREMENTS</u> :

The following control technologies have been identified as the most stringent, achieved in practice control technologies:

BEST CONTROL TECHNOLOGIES ACHIEVED				
Pollutant	Standard	Source		
VOC	No Standard			
NOx	No Standard			
SOx	No Standard			
PM10	 Storage piles adequately wetted to prevent visibile emissions > 5%. Enclosed silo vented to a control device with 99% efficiency (baghouse, bin vent or equivalent). Loadout screw/auger served by a chute/boot that extends into the cement compartment. (A) 	SMAQMD, SJVAPCD SMAQMD, SJVAPCD, BAAQMD, SDCAPCD Applicant		
PM2.5	No standard			
со	No Standard			

(A) The use of a flexible chute/boot is common practice for these types of operations as it avoids loss of the cement product.

B. TECHNOLOGICALLY FEASIBLE AND COST EFFECTIVE (Rule 202, §205.1.b.):

Technologically Feasible Alternatives:

Any alternative basic equipment, fuel, process, emission control device or technique, singly or in combination, determined to be technologically feasible by the Air Pollution Control Officer.

The table below shows the technologically feasible alternatives identified as capable of reducing emissions beyond the levels determined to be "Achieved in Practice" as per Rule 202, §205.1.a.

Pollutant	Technologically Feasible Alternatives	
VOC	Not applicable	
NOx	Not applicable	
SOx	Not applicable	
PM10	Loadout vented to a baghouse	
PM2.5	Same as PM10	
СО	Not applicable	

Technologically Feasible Analysis Summary

The District's current BACT determination (No. 193) for concrete batch plants would apply to operations that load ready-mix trucks or include a central mixer. BACT No. 193 includes requirements for weight batchers and loadout. The weigh batchers are required to be served by a baghouse. The central mixer and truck loadout are also required to be served by a

BACT Determination Volumetric Truck Based Concrete/Gunite Plants Page 8 of 9

baghouse. As explained in the introductory section of this determination, there is a difference in plant setup between operations that load ready-mix trucks and volumetric trucks. Α volumetric truck cannot be loaded using the setup of a standard concrete batching operation. There are no weigh batchers associated with the loading of the volumetric trucks. As the loading of the sand and aggregate are done throught the use of a front-end loader. The loading of the cement into the truck's cement compartment is done through an auger (6" or 10" diameter) that includes a flexible chute/boot that extends into the cement compartment. The loading of a standard ready-mix truck is done through a loading chute that is gravity fed into the ready-mix truck's drum entrance. The standard ready mix loadout includes a support structure that allows the materials to be gravity fed into the truck's mixing drum. The support structure also allows the addition of ducting in order to vent the loadout's particulate emissions to a baghouse. The cement silos that serve the volumentric truck loading operations, only include an auger that loads the cement into the truck's cement compartment. The loading auger is not a support structure. To include the use of a baghouse for the loading of a volumetric truck would require a redesign and reconfiguration of the operation. Therefore, the use of a baghouse for the loadout will be not be technologically feasible.

Using the PM10 BACT standard for PM2.5:

Since both, PM10 and PM2.5 trigger BACT at > 0 lb/day and PM2.5 is a subset of PM10, BACT for PM2.5 will be triggered whenever BACT is triggered for PM10. Therefore, BACT for PM2.5 will be set to be the same as for PM10.

C. SELECTION OF BACT:

Minor Source BACT for a stationary concrete/gunite volumetric truck loading operation is the following:

BACT FOR STATIONARY VOLUMETRIC TRUCK BASED CONCRETE/GUNITE PLANTS				
Pollutant	Standard	Source		
VOC	NA	NA		
NOx	NA	NA		
SOx	NA	NA		
	 Storage piles adequately wetted to prevent visible emissions > 5%. 	SMAQMD, SJVAPCD		
PM10	 Enclosed silo vented to a control device with 99% efficiency (baghouse, bin vent or equivalent). 	SMAQMD, SJVAPCD, BAAQMD, SDCAPD		
	 Loadout screw/auger served by a flexible chute that extends into the cement compartment. 	Applicant		
PM2.5	Same as PM10	Same as PM10		
со	NA	NA		

BACT Determination Volumetric Truck Based Concrete/Gunite Plants Page 9 of 9

D. SELECTION OF T-BACT:

Toxics are in the form of PM. The control of particulate matter through meeting the BACT standard will also control toxics found in the PM. Therefore, meeting the BACT controls for the control of PM will be considered equivalent to meeting T-BACT requirements.

APPROVED BY:

lan ON

____ DATE: <u>5/24/19</u>

Attachment A Review of BACT Determination

ACT	IVE
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SMAQMD BACT CLEARINGHOUSE

BACT Size	: Greater than	or equal to 5 cubic yards pe	ETE BATCH PLANT er	Concrete Batch Pla
PACT Def	ermination Numb		BACT Determination Date:	8/14/2018
DACIDE				0/ 14/2010
		2 	Information	
Permit Nu		Generic BACT Determination	n	
	nt Description:	Concrete Batch Plant		
	Rating/Capacity:	Greater than or equal to	5 cubic yards per batch	
Equipmer	nt Location:			
		BACT Determina	tion Information	
ROCs	Standard:	No Stadard		
1.005	Technology	1		
	Description:			
	Basis:	Achieved in Practice		
NOx	Standard:	No Standard		
NOA	Technology			
	Description:			
	Basis:	Achieved in Practice		
SOx	Standard:	No Standard		
	Technology			
	Description:			
	Basis:	Achieved in Practice No Standard		
PM10	Standard:	See page 8 of 8 of BACT Deter	mination 102	
	Technology Description:	See page 0 01 0 01 DACT Deter		
	Basis:	Achieved in Practice		
PM2.5	Standard:	Equivalent to PM10 controls		
PWIZ.5	Technology	See page 8 of 8 of Bact Determ	nination 193	
	Description:	19 (5440)		
	Basis:	Achieved in Practice		
со	Standard:	No Standard		
	Technology			
	Description:	Achieved in Presting		
	Basis:	Achieved in Practice No Standard		
LEAD	Standard:			
	Technology Description:			
	Basis:	Achieved in Practice		
Comment	s: The Technology de the control require	escription is too long to fit in the comments of PM10/PM2.5. nent period ended on 8/13/18.	mment section. Please see page 8 of 8 of	Bact Determination 193 for

BACT & T-BACT Determination Concrete batch Plant >= 5 cubic yard per batch May 30, 2018 Page 8 of 8

NOx	No Standard	1
	No. Observational	
SÓx	No Standard	
	No Standard	
PM10	 Sand and Aggregate storage: outdoor storage piles adequately wetted to prevent visible emissions > 5% opacity Sand and aggregate handling (all transfer points): water sprays on all transfer points Sand and aggregate weigh batcher: material adequately wetted to prevent visible emissions > 5% opacity Storage silos for cement, flyash and other supplements: enclosed silo vented to a control device with 99% efficiency (baghouse, bin vent or equivalent) Cement weigh batcher: enclosed weigh batcher vented to a control device with 99% efficiency (baghouse or equivalent) Transit-mixed truck loading: loading operation enclosed by a flexible shroud which seals to the truck and is vented to a control device with 99% efficiency (baghouse or equivalent) Central mixer loading: Enclosed mixer vented to a control device with 99% efficiency (baghouse or equivalent) 	SJVAPCD
PM2.5 (A)	Equivalent to PM10 control standards	SMAQMD

(A) The control of PM2.5 is considered equivalent to the control of PM10.

D. SELECTION OF T-BACT:

Toxics are in the form of PM. The control of particulate matter through meeting the BACT standard will also control toxics found in the PM. Therefore meeting the BACT controls for the control of PM will be considered equivalent to meeting T-BACT requirements.

Par Film **REVIEWED BY:** DATE: ______11-18 bught fign DATE: 7/11/18 APPROVED BY:

San Joaquin Valley Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 6.2.2* Last Update: 07/31/2018

Concrete Batch Plant

	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
PM10			
	capacity: enclosed mixer vented to a control device		

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process:	Concrete Batch Plant

		16 ⁻	Criteria Pollut	ants		
Rating/Size	VOC	NOx	SOx	CO	PM 10	Inorganic
Central Mixed, < 5 Cubic Yards/Batch					Water Spray (1988)	
Central Mixed, ≥ 5 Cubic Yards/Batch					Baghouse for Cement Handling and Adequate Moisture in Aggregate (1988)	
Transit-Mixed					Baghouse Venting the Cement Weigh Hopper and the Mixer Truck Loading Station; and Adequate Aggregate Moisture (07-11-97)	

* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

BACT Guidelines - Part D

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Concrete Batch Plant

BAY AREA AIR QUALITY MANAGEMENT DISTRICT Best Available Control Technology (BACT) Guideline

Source Category

Source:		Revision:	1
	Concrete Batch Plants	Document #:	49.1
Class:	< 5 cubic yards per batch	Date:	09/04/91

Determination

POLLUTANT	BACT 1. Technologically Feasible/ Cost Effective 2. Achieved in Practice	TYPICAL TECHNOLOGY
POC	1. n/a 2. n/a	1. n/a 2. n/a
NOx	1. n/a 2. n/a	1. n/a 2. n/a
SO ₂	1. n/a 2. n/a	1. n/a 2. n/a
СО	1. n/a 2. n/a	1. n/a 2. n/a
PM 16	1. n/d 2. Water spray for aggregate handling, agregate storage piles, and site road surfaces; and Enclosure and venting of cement handling and storage to baghouse $w/ \leq 0.01 \text{ gr/dscf}^{2}$	 n/d BAAQMD Approved Design and Operation^a
NPOC	1. n/a 2. n/a	1. n/a 2. n/a

References

a. **BAAQMD**

BAY AREA AIR QUALITY MANAGEMENT DISTRICT Best Available Control Technology (BACT) Guideline

Source Category

		Revision:	1
Source:	Concrete Batch Plants	Document #:	49.2
Class:	≥ 5 Cubic yards per batch	Date:	09/04/91

Determination

POLLUTANT	BACT 1. Technologically Feasible/ Cost Effective 2. Achieved in Practice	TYPICAL TECHNOLOGY
POC	1. n/a 2. n/a	1. n/a 2. n/a
NOx	1. n/a 2. n/a	1. n/a 2. n/a
SO ₂	1. n/a 2. n/a	1. n/a 2. n/a
CO	1. n/a 2. n/a	1. n/a 2. n/a
PM 10	1. Water spray w/ chemical suppressants for aggregate handling and storage piles; and Paving of site road surfaces; and Enclosure and venting of cement handling and storage to baghouse w/ ≤ 0.0013 gr/dscf ^{4,b} 2. Water spray for aggregate handling, aggregate storage piles, and site road surfaces; and Enclosure and venting of cement handling and storage to baghouse w/ ≤ 0.01 gr/dscf ⁴	 BAAQMD Approved Design and Operation^a BAAQMD Approved Design and Operation^a
NPOC	1. n/a 2. n/a	1. n/a 2. n/a

References

a. BAAQMD	-
b. BAAQMD A #4770	

CONCRETE BATCH PLANTS Fee Schedule 08A

Review the BACT Control Option listed below. The applicant must propose the Control Option listed or perform a Top-down BACT Analysis as described in Section 4 to justify the selection of another Control Option. The applicant will be required to provide documentation that the Control Option selected meets the requirements listed in the table.

	VOC	NOx	SOx	PM*
BACT Emission Rate Limit	(N/A)	(N/A)	(N/A)	<0.008 grain/dscf
BACT Control Option	(N/A)	(N/A)	(N/A)	 99% efficient Fabric or Cartridge type vent filters on silos. Enclosed cement weigh hoppers, screw conveyors and concrete batcher vented to a 99% efficient fabric filter baghouse. Flexible shroud which seals to the truck along with a water sprinkler system used when dry products are mixed. Shroud vented to 99% efficient fabric filter baghouse Water spray system for sand and aggregate transfer points. Sand and aggregate storage piles adequately wet to maintain a minimum moisture content of 4% by weight.
				Open areas maintained adequately wet to prevent fugitive emissions in excess of 20 percent opacity or Ringlemann 1. (A/P)

The applicant may choose to limit the Potential to Emit (PTE) from the equipment to less than 10 pounds per day for each pollutant in lieu of meeting the stated BACT requirement.

* The BACT emission rate limit is based on TSP which is used as a surrogate for PM10.