MEMORANDUM

TO:

FILE - GENEVA ROCK PRODUCTS fka WILKINSON CONSTRUCTION

THROUGH:

Jay Morris, Minor Source Compliance Section Manager

FROM:

Chad Gilgen, Environmental Scientist 6

DATE:

June 28, 2016

SUBJECT:

FCE, SM, Morgan County, AIRS #02900005

INSPECTION DATE:

May 12, 2016. Records received May 20 and June 22, 2016.

SOURCE LOCATION:

3175 West Old Highway Road, Morgan, UT 84050

SOURCE CONTACT(S):

Sam Bernard – Environmental Specialist, 801-802-6954

sbernard@clydeinc.com Kurt Stapley – Plant Foreman

OPERATING STATUS:

The source is currently operating only the Hot Mix Asphalt

Plant and associated equipment.

PROCESS DESCRIPTION:

Geneva Rock Products has pre-crushed aggregate material delivered to the source location which is then screened, washed, and processed through the asphalt plant drum mixer. Emissions from the asphalt plant drum mixer pass through a

baghouse before being vented to the atmosphere.

APPLICABLE REGULATIONS:

-Approval Order DAQE-809-00, dated December 22, 2000

-Approval Order dated July 2, 1980, for a portable Barber-

Green Model DM-50 Drum Mix Asphalt Plant

-NSPS (Part 60), I: Standards of Performance for Hot Mix

Asphalt Plants

-NSPS (Part 60), OOO: Standards of Performance for

Nonmetallic Mineral Processing Plants

-Title V (Part 70) Area Source

SOURCE EVALUATION:

General Conditions:

1. This Approval Order (AO) applies to the following company:



1

Wilkinson Construction Company, Inc.

1200 East 100 South Morgan, UT 84050

Phone Number:

(801)-829-6833

Fax Number:

(801)-829-3643

The equipment listed below in this AO shall be operated at the following location:

PLANT LOCATION:

3175 West Old Highway Road, Morgan, Utah 84050 Morgan County

Universal Transverse Mercator Coordinate System: 4,551.2 kilometers Northing; 436.9 kilometers Easting; Zone 12

Status:

In compliance. Plant location address is accurate.

The plant was purchased by Geneva Rock Products in 2015. The appropriate forms were filed with DAQ in December 2015 and January 2016. See attached *DAQE-GN109810004-15*, *RE: Submission of "Ownership Change/Company Name Change Notification" Form*, and *DAQE-GN109810005-16* for additional information.

Corporate office location: Geneva Rock Products 730 North 1500 West Orem, UT 84057

Phone Number: 801-802-6954

2. Definitions of terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code Rule 307 (UAC R307), and Series 40 of the Code of Federal Regulations (40 CFR). These definitions take precedence unless specifically defined otherwise herein.

Status:

In compliance. Unless otherwise noted, all definitions of terms, abbreviations, and references used in this AO conform to those in UAC R307 and 40 CFR.

3. Wilkinson Construction Company, Inc. (Wilkinson) shall install and operate the asphalt plant drum mixer and shall conduct its operations of the asphalt plant and a crushing operation in accordance with the terms and conditions of this AO, which was written pursuant to Wilkinson's Notice of Intent submitted to the Division of Air Quality (DAQ) on April 26, 2000 and additional information submitted to the DAQ on July 17, 2000.

Status:

In compliance. The source confirmed they are operating the asphalt plant drum mixer in accordance with the terms of this AO. The source was not operating the crushing portion of the operation at the time of inspection and indicated there are no plans for its use in the immediate future.

4. The approved installations shall consist of the following equipment or equivalent*:

- Asphalt Plant Drum Mixer, manufacturer CMI, Model PTD-400*, rated at 400 A. tons per hour. Exhaust gases are vented through a baghouse, Model CMI RA3.
- В. Baghouse, model CMI RA3-18PTD*, Serial Number 203

C. One triple Deck Screen: Capacity 400 tons per hour

Manufacturer: Cedar rapids

Model:

El Jay CSC 45*

Year:

1996

D. One 45" Cone Crusher: Capacity 400 tons per hour

Manufacturer: Cedar rapids Model:

Year:

El Jay CSC 45* 1996

E. One 45" Roll Crusher: Capacity 400 tons per hour

Manufacturer: Cedar rapids

Model:

880*

Year:

1954

- F. Conveyors
- G. One diesel storage tank: capacity 5,000 gallon
- H. Associated support equipment for conveying, heating, storing, classifying, drying aggregate, asphalt oil, and finished product.

Any future changes or modifications to the equipment and processes approved by this AO that could affect the emissions covered by this AO must be approved in accordance with R307-401-1, UAC.

Status: In compliance. No unapproved equipment was observed operating at the source.

Additional equipment information gathered at the time of inspection:

- D. One 45" Cone Crusher was idle/not on-site at the time of inspection
- E. One 45" Roll Crusher was idle/not on-site at the time of inspection
- G. One diesel storage tank: capacity 5,000 gallon has been replaced with a 12,000 gallon tank. Geneva Rock Products was contacted regarding the tank replacement on June 16, 2016. Geneva Rock Products indicated the 12,000 gallon tank was on-site when the plant was purchased from Wilkinson Construction Products in December 2015 and they were in the process of submitting a replacement-in-kind letter to DAQ

Limitations and Tests Procedures

^{*} Equivalency shall be determined by the Executive Secretary.

5. Emissions to the atmosphere at all times from the indicated emission point shall not exceed the following rate and concentration:

Source: Drum Mixer Vented Through the Baghouse:

Pollutant lb/hr grains/dscf

(68°F, 29.92 in Hg)

RAP denotes recycled asphalt pavement

Status:

In compliance. The most recent stack test was conducted in June 2011 with the following results:

Asphalt Plant	Pollutant	Permitted Limit	Test Results
CMI	PM10	0.024 gr/dscf	0.0016 gr/dscf

The source plans to conduct the next stack test on July 5, 2016. The pretest protocol was submitted for DAQ review on May 18, 2016.

6. Stack testing to show compliance with the emission limitations stated in Condition #9 shall be performed as specified below:

A.	Emission Point	Pollutant	Testing Status	Test <u>Frequency</u>
	Drum exhaust passing through Baghouse	PM ₁₀ (virgin and RAP)	*	@

- B. <u>Testing Status</u> (To be applied above)
 - * Initial compliance testing is required. The initial test date shall be performed as soon as possible and in no case later than 180 days after the issuance of this AO. Compliance testing shall not be required for both virgin and recycle materials during the same testing period. Testing shall be performed for the product being produced during the time of testing.
 - Test every five years, or sooner if directed by the Executive Secretary. Tests may be required if the source is suspected to be in violation with other conditions of this AO. Compliance testing shall not be required for both virgin and recycle materials during the same testing period. Testing shall be performed for the product being produced during the time of testing.
- C. Notification

At least 30 days prior to conducting any emission testing required under any part of UAC, R307, the owner or operator shall notify the Executive Secretary of the date, time and place of such testing and, if determined necessary by the Executive Secretary, the owner or operator shall attend a pretest conference. A source test protocol shall be submitted to DAQ when the testing notification is submitted to the Executive Secretary. The source test protocol shall be approved by the Executive Secretary prior to performing the test(s). The source test protocol shall outline the proposed test methodologies, stack to be tested, and procedures to be used. A pretest conference shall be held, if directed by the Executive Secretary. The pretest conference shall include representation from the owner/operator, the tester, and the Executive Secretary. The emission point shall be designed to conform to the requirements of 40 CFR 60, Appendix A, Method 1, or other methods as approved by the Executive Secretary. An Occupational Safety and Health Administration (OSHA) or Mine Safety and Health Administration (MSHA) approved access shall be provided to the test location.

D. <u>TSP</u>

40 CFR 60, Appendix A, Method 5

E. PM_{10}

For stacks in which no liquid drops are present, the following methods shall be used: 40 CFR 51, Appendix M, Methods 201 or 201a. The back half condensibles shall also be tested using the method specified by the Executive Secretary. All particulate captured shall be considered PM₁₀.

For stacks in which liquid drops are present, methods to eliminate the liquid drops should be explored. If no reasonable method to eliminate the drops exists, then the following methods shall be used: 40 CFR 60, Appendix A, Method 5, 5a, 5d, or 5e as appropriate. The back half condensibles shall also be tested using the method specified by the Executive Secretary. The portion of the front half of the catch considered PM₁₀ shall be based on information in Appendix B of the fifth addition of AP-42 or other data acceptable to the Executive Secretary.

The back half condensibles shall not be used for compliance demonstration but shall be used for inventory purposes.

F. Sample Location

40 CFR 60, Appendix A, Method 1

G. Volumetric Flow Rate

40 CFR 60, Appendix A, Method 2

H. New Source Operation

For a new source/emission point, the production rate during all compliance testing shall be no less than 90% of the maximum production rate (rated capacity) of the plant. If the maximum AO allowable production rate has not been achieved at the time of the test, the following procedure shall be followed:

- 1) Testing shall be at no less than 90% of the production rate achieved to date.2) If the test is passed, the new maximum allowable production rate shall be 110% of the tested achieved rate. This new maximum allowable production rate shall be less than 90% of the allowed maximum production rate. This new allowable maximum production rate shall remain in effect until successfully tested at a higher rate.
- 3) The owner/operator shall request a higher production rate when necessary. Testing at no less than 90% of the higher rate shall be conducted. A new maximum production rate (110% of the new rate) will then be allowed if the test is successful. This process may be repeated until the maximum AO production rate is achieved.

I. Existing Source Operation

For an existing source/emission point, the production rate during all compliance testing shall be no less than 90% of the maximum production achieved in the previous three (3) years.

Status:

In compliance. A review of the source file indicates all requirements of this condition are met.

This condition currently states "Stack testing to show compliance with the emission limitations stated in Condition #9." Emission limitations are referenced in Condition #5. A meeting was held with the Minor Source New Source Review Section Manager on June 16, 2016, to address this error. An administrative amendment referencing the correct condition will be submitted.

7. Visible emissions from any point or fugitive emission source associated with the facility shall not exceed the following limitations:

A.	Asphalt (baghouse)	10% opacity
B.	All crushers	15% opacity
C.	All screens	10% opacity
D.	All conveyor transfer points	10% opacity
E.	Conveyor drop points	15% opacity
F.	All other points	20% opacity

Opacity observations of emissions from stationary sources shall be conducted in accordance with 40 CFR 60, Appendix A, Method 9.

Status:

In compliance. The requirements of this condition were reviewed at the time of inspection. Visible emissions associated with the loadout silos appeared to approach the 20% limit for 7.F. during truck loading. The source was reminded to monitor these emissions to ensure they remain below the 20% opacity limit. No other visible emissions were observed during the inspection. See attached *VEO Form* for additional information.

8. The following production limits shall not be exceeded without prior approval in accordance with R307-401-1, UAC:

A. Asphalt production 500,000 tons per rolling 12-month period

B. Total aggregate processed 475,000 tons per 12-month period

Total aggregate processed includes aggregates used in the asphalt production as well as aggregates hauled offsite. Records of asphalt production and aggregate processed shall be kept to show compliance with above. Compliance with the annual production limitations shall be determined on a rolling 12-month total. Wilkinson Construction Company, Inc. shall calculate new 12-month totals by the twentieth day of each month using data from the previous 12 months. Records of production shall be kept for all periods when the plant is in operation. These records, including rolling 12-month totals, shall be made available to the Executive Secretary or Executive Secretary's representative upon request and the records shall include the two year period prior to the date of the request. Production of asphalt shall be determined by belt scale records or vendor receipts. Amount of aggregates hauled offsite shall be determined by scale house records or vendor receipts. Annual aggregate processed shall be determined as follows:

((asphalt production total - RAP usage) * 0.95) + aggregate hauled offsite.

Status:

In compliance. A and B for the May 2015 – April 2016 rolling 12-month period are as follows:

A. Asphalt production 70,896 tons
B. Total aggregate processed 0 tons

See attached *Geneva Rock Products – Morgan Asphalt-Facility Visit* email and, *Rolling 12 Month AO Requirements - corrected* for additional information.

9. A manometer or magnehelic pressure gage shall be installed to measure the differential pressure across the fabric filter. Static pressure differential across the fabric filter shall be between 2 to 6 inches of water column. The pressure gauge shall be located such that an inspector/operator can safely read the indicator at any time. The reading shall be accurate to within plus or minus 1.0 inch of water column. The instrument shall be calibrated against a primary standard annually. Daily recording of the reading is required.

Status:

In compliance. Static pressure differential was observed at 2.6 inches of water column at the time of inspection. The electronic monitoring gauge can be viewed from the control room. The reading is continuously monitored and logged. Calibration was last conducted on May 19, 2016. See attached *Geneva Rock Products – Morgan*

Asphalt-Facility Visit email, and Plant Bag House Annual Recalibration for additional information.

- 10. The following operating parameters shall be maintained within the indicated ranges:
 - A. The temperature of the gases exiting the baghouse shall not be less than 160°F or more than 350°F.
 - B. The asphalt mix temperature shall not exceed 350°F.

They shall be monitored with equipment located such that an inspector/operator can safely read the output any time. The readings shall be accurate to within the following ranges:

C. Temperature - Plus or minus 10°F.

All instruments shall be calibrated against a primary standard at least once every year.

Status:

In compliance. The monitoring equipment can be viewed from the control room. The requirement to calibrate the instrument annually was reviewed at the time of inspection. The operating parameters observed at the time of inspection were:

- A. 189°F for the temperature of the gases exiting the baghouse.
- B. 332°F for the asphalt mix temperature.
- 11. The amount of recycle asphalt used shall not exceed 40% of the total product at any time. Compliance shall be determined by the hourly amount of recycle product introduced to the kiln divided by the actual hourly production of asphalt. Monthly records maintained on site shall include:
 - A. Total production of asphalt
 - B. Amount of recycle asphalt used in the total production
 - C. Monthly calculations of the percent recycle used in the total production

Status:

In compliance. The source was originally found out of compliance for exceeding the 40% total production limit of recycled asphalt for April 2016. A warning letter (see attached *DAQC-889-16*) addressing the deficiency was issued on June 22, 2016. The source responded providing updated information showing recycled asphalt for April 2016 at 32% of the total production limit. See attached *Rolling 12 Month AO* Requirements – original, Rolling 12 Month AO Requirements – corrected, and FW: AO Report Morgan email for additional information.

Roads and Fugitive Dust

12. All unpaved roads and other unpaved operational areas shall be water sprayed and/or chemically treated to the extent necessary to prevent, as far as practicable, the generation of fugitive dusts as dry conditions warrant or as determined necessary by the Executive

Secretary. Records of treatment shall be made available to the Executive Secretary upon request and shall include a period of two years prior to the date of request. The length of paved road under the owner/operator's jurisdiction shall be periodically swept or sprayed clean as dry conditions warrant or as determined necessary by the Executive Secretary. Records of cleaning of paved road shall be made available to the Executive Secretary upon request and shall include a period of two years prior to the date of request. All records shall include the following items:

- A. Date:
- B. Number of treatments made or sweep/spray cleaned;
- C. Rainfall received, if any, and approximate amount;
- D. Time of day treatments or sweeping/spray cleaned were made.

Also, owner/operator of this source who through his/her operations deposit materials which may create fugitive dust on a public or private road is required to clean the road such that fugitive dust as a result of his/her operations is minimized.

Status:

In compliance. Records viewed at the time of inspection included all required information. Water records for May 2-13, 2016, were provided following the inspection. See attached *Weekly Watering Log* for additional information.

- 13. The haul road limitations shall be:
 - A. 0.30 mile in length round trip (paved)
 - B. Maximum speed: 10 miles per hour (posted)

These limitations shall not be exceeded without prior approval in accordance with R307-401, UAC. The vehicle speed on the haul road speed shall be posted, at a minimum, on site at the beginning of the haul road so that it is clearly visible from the haul road.

Status:

In compliance. The paved haul road appeared to be less than .30 mile in length round trip. A 10 MPH speed limit sign was observed at the entrance.

14. Visible fugitive dust emissions from haul-road traffic and mobile equipment in operational areas shall not exceed 20% opacity. Visible emissions determinations for traffic sources shall use procedures similar to Method 9. The normal requirement for observations to be made at 15-second intervals over a six- minute period, however, shall not apply. Six points, distributed along the length of the haul road or in the operational area, shall be chosen by the Executive Secretary or the Executive Secretary's representative. An opacity reading shall be made at each point when a vehicle passes the selected points. Opacity readings shall be made ½ vehicle length or greater behind the vehicle and at approximately ½ the height of the vehicle or greater. The accumulated six readings shall be averaged for the compliance value.

Status:

In compliance. No fugitive dust associated with haul-road traffic or mobile equipment was observed at the time of inspection.

Fuels

15. The sulfur content of any fuel oil or diesel burned shall not exceed 0.5 percent by weight. Sulfur content shall be decided by ASTM Method D-4294-89, or approved equivalent. The sulfur content shall be tested if directed by the Executive Secretary.

Status:

In compliance. The source uses ultra-low sulfur diesel fuel from Christensen Oil. See attached *Geneva Rock Products – Morgan Asphalt-Facility Visit* email and *Low Sulfur Certification* for additional information.

16. The owner/operator shall use only #2 fuel oil or cleaner fuel for on-site equipment. If any other fuel is to be used, an AO shall be required in accordance with R307-401-1, UAC.

Status:

In compliance. The source confirmed they use only ultra-low sulfur diesel fuel at the time of inspection. See status of condition 15 for additional information.

Federal Limitations and Requirements

17. In addition to the requirements of this AO, all applicable provisions of 40 CFR 60, New Source Performance Standards (NSPS) Subpart A, 40 CFR 60.1 to 60.18 and Subpart I, 40 CFR 60.90 to 60.93 (Standards of Performance for Hot Mix Asphalt Facilities) apply to this installation. This facility must operate in accordance with the most current version of 40 CFR 60 applicable to this plant to be in compliance.

Status:

In compliance. The requirements of this condition are satisfied by compliance with conditions 5 and 6 of the AO.

18. In addition to the requirements of this AO, all applicable provisions of 40 CFR 60, New Source Performance Standards (NSPS) Subpart A, 40 CFR 60.1 to 60.18 and Subpart OOO, 40 CFR 60.670 to 60.676 (Standards of Performance for Nonmetallic Mineral Processing Plants) apply to this installation. This facility must operate in accordance with the most current version of 40 CFR 60 applicable to this plant to be in compliance.

Emission points that are subject to the initial observations are:

- A. Cedar rapids cone crusher El Jay CSC 45
- B. All screens
- C. All conveyor transfer points

If the initial compliance opacity observations have been performed for these points, a repeat of the observations is not required.

Status:

In compliance. The previous inspection memorandum (DAQC-783-2014) indicates John Wilkinson – the former owner - confirmed the initial Subpart OOO observations were performed by DMK Environmental Engineering.

Records & Miscellaneous

19. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this Approval Order including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded, and the records shall be maintained for a period of two years. Maintenance records shall be made available to the Executive Secretary or Executive Secretary's representative upon request, and the records shall include the two-year period prior to the date of the request.

Status:

In compliance. All source equipment appeared to be properly maintained at the time of inspection. All records were provided upon request or emailed following the inspection. The source indicated the baghouse associated with the hot mix asphalt plant underwent testing and maintenance during the winter and is operating within normal range.

20. The owner/operator shall comply with UAC, R307-150 Series. Inventories, Testing and Monitoring. This rule addresses regulated pollutant and hazardous air pollutant emission inventory reporting requirements, and emission statement inventory requirements. The full text of UAC R307-150 Series, Inventories, Testing and Monitoring is included as Appendix A. However, to be in compliance, this facility must operate in accordance with the most current version of the UAC, R307-150 series.

Status:

In compliance. The 2014 emission inventory was submitted and can be found using the DAQ Report Tool.

21. The owner/operator shall comply with R307-107, UAC. This rule addresses unavoidable breakdown reporting requirements. The full text of UAC R307-107 General Requirements, Unavoidable Breakdown, is included as Appendix B. However, to be in compliance, this facility must operate in accordance with the most current version of the UAC, R307-107.

Status:

In compliance. No reportable breakdowns have occurred since the previous compliance inspection on equipment permitted under this Approval Order. The rule was reviewed at the time of inspection and a copy was provided for future source reference.

APPLICABLE FEDERAL REQUIREMENTS

In addition to the requirements of this AO, all applicable provisions of the following federal programs have been found to apply to this installation. This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including UAC R307.

NSPS (Part 60), A: General Provisions

Status: In compliance. See status of each NSPS condition for additional information.

NSPS (Part 60), I: Standards of Performance for Hot Mix Asphalt Plants

Status: In compliance. This applicable federal requirement is satisfied by compliance with conditions 5, 6, and 17 of the AO.

NSPS (Part 60), OOO: Standards of Performance for Nonmetallic Mineral Processing Plants

Status: In compliance. This applicable federal requirement is satisfied by compliance with condition 18 of the AO.

Title V (Part 70) Area Source

Status:

In compliance. This condition is satisfied by compliance with the AO.

AREA SOURCE RULES EVALUATION:

The following Area Source Rules were evaluated during this inspection:

R307-203. Emission Standards: Sulfur Content of Fuels

Status:

In compliance. This area source rule is satisfied by compliance with condition 15 of the

AO.

R307-205. Emission Standards: Fugitive Emissions and Fugitive Dust

Status:

In compliance. This area source rule is satisfied by compliance with condition 14 of the AO.

110.

EMISSION INVENTORY:

Geneva Rock Products Emissions Inventory data for the 2014 activity year are recorded as follows:

	Pollutant	Tons/yr
1.	Benzene	0.00793
2.	Beryllium (TSP)	0
3.	Cadmium	
4.	Carbon Monoxide	4.44
5.	Chromium Compounds	0.000117
6.	Cobalt (TSP)	
7.	Formaldehyde	
8.		
9.		
10.	PM ₁₀	
	PM _{2.5}	
12.	Primary PM ₁₀ , Condensible Portion	0.084
13.	Primary PM ₁₀ , Filterable Portion	7.56
14.	Primary PM _{2.5} , Condensible Portion	0.084
15.	Primary PM _{2.5} , Filterable Portion	2.61
16.	SO ₂	0.539
17.	VOCs	1.31

PREVIOUS ENFORCEMENT ACTIONS:

No enforcement actions within the past five years.

COMPLIANCE STATUS & RECOMMENDATIONS:

In compliance with all conditions of Approval Order DAQE-809-00. The source appears to be well maintained and operated. Required records were current and were emailed following the inspection.

The source was originally found out of compliance for exceeding the 40% total production limit of recycled asphalt for April 2016. A warning letter (see attached *DAQC-889-16*) addressing the deficiency was issued on June 22, 2016. The source responded providing updated information showing recycled asphalt for April 2016 at 32% of the total production limit. See attached *Rolling 12 Month AO Requirements – original, Rolling 12 Month AO Requirements – corrected*, and *FW: AO Report Morgan email* for additional information. No further compliance action recommended.

Compliance not determined for Approval Order dated August 6, 1980, for a Barber Greene Model DM-50 portable asphalt plant. This asphalt plant was not on-site at the time of inspection. The source indicated this piece of equipment is currently idle at another location with no current plans to bring it back online.

HPV STATUS:

Not Applicable.

RECOMMENDATION FOR NEXT INSPECTION:

The source indicated on June 16, 2016, that they would be submitting a letter regarding equipment use and future plans at the source location. This letter was received on June 22, 2016. See attached *RE: Geneva Rock Products, Approval Order DAQE-809-00-Morgan, Utah* for additional information. This letter also indicated the source would be submitting a replacement-in-kind letter for the diesel fuel tank and any other equipment that may require such a letter. Confirm that replacement-in-kind letters have been submitted.

It was noted during post-inspection review that the AO currently references condition 9, rather than condition 5, for emission limitation specifications. The Minor Source New Source Review Section Manager was notified regarding this as well as the need for a name change to reflect Geneva Rock Products as the current source owners. See attached *Administrative Amendment* email for additional information. Confirm the appropriate changes have been made to the AO.

Check to see if the source has resumed using the Barber-Greene Model DM 50 portable asphalt plant.

Steel-toed boots, hard hats, safety glasses, hearing protection, and reflective clothing are required to tour source operations.

ATTACHMENTS:

VEO Form, 1980 AO, DAQE-GN109810004-15, RE: Submission of "Ownership Change/Company Name Change Notification" Form, DAQE-GN109810005-16, Geneva Rock Products – Morgan Asphalt-Facility Visit email, Rolling 12

Month AO Requirements - original, Rolling 12 Month AO Requirements - corrected, FW: AO Report Morgan email, DAQC-889-16, Plant Bag House Annual Recalibration, Weekly Watering Log, Low Sulfur Certification, Administrative Amendment email, RE: Geneva Rock Products, Approval Order DAQE-809-00-Morgan, Utah.

STATE OF UTAH, DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY



EPA METHOD 9 - VISIBLE EMISS					
Source Name: Geneva Rock -Wilkinson Street Address: 3/15 West Old Hwy Rd	OBSERVAT	TION DATE:	5-12-1	6	
Street Address: 3/75 Wost Old Hwy Rd	Start time:	12:30	Stop time:	2:30	
City/County: Peterson / Morgan					
Phone:	min sec	0	15	30	45
Site ID: 1098	1	11/61	2 1 6	1 1/0	
Equipment/Process: ASPhat Mixers, Screens,	2	NEC	1101	19460	1
Equipment/Process: ASPhat MIXELS, SCIEENS	3	Sun	qual	not	-
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Ambient Temp: F RH:%	10				
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Distance From Observer:	12				
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Distrib: white-file; canary-inspector; pink-owner/operator

Governor



DEPARTMENT OF ALTH

DIVISION OF ENVIRONMENTAL HEALTH
150 West North Temple, P.O. Box 2500, Sait Lake City, Ut26 84110

533-6108 August 5, 1980 Room 428 801-533-5121

emer O. Mason, M.D., Dr. 2.K. Enecutive Director

\$01-553-6111

DIVISIONS

Community Health, Services Indisonmental Hoclin Comming Health Services feath. Care Financing cod Standards

OSFICES
Varnie literatus Services
12(12) Principal end
Policy Development
Valicy Exeminer
12(1) Exeminer
12(1) Health Laboratory

John Wilkinson 1200 East 100 South East Round Valley Road Morgan, Utah 84050 Portable - not on-site of insp.

Re: Air Quality Approval Order for Drum Mix Asphalt Plant Barber-Greene Model DM-50

Dear Mr. Wilkinson:

a, go stiff by harding the arrive at the co

On July 2, 1980 the Executive Secretary published a notice of intent to approve your proposed asphalt plant. The 30-day public comment period expired August 1, 1980 and no comments were received. Since your controlled emissions are less than 3 tons/year, you are considered a minor source for PSD purposes.

This air quality approval order authorizes the installation and operation of the Barber-Greene Model-50 portable asphalt plant to be operated in Peterson. Morgan County as proposed in your notice of intent dated June 4, 1980 with the following conditions:

- 1. Visible emissions shall not exceed 20%.
- 2. A stack test shall be performed by the company within 60 days of initial startup. Maximum grain loading shall not exceed 0.03 grains per dscf. Contact must be made with the Bureau of Air Quality for a pre-test conference.
 - 3. The aggregate pit, haul roads, and non-working faces of stockpile shall be water sprayed or chemically stabilized as dry weather conditions warrant or as determined necessary by the Executive Secretary to minimize fugitive dusts.
 - 4. A record/log of stabilizing performed is to be kept which includes dates, types, amounts, and area of application. This record/log shall be made available to the Executive Secretary upon request.

An initial compliance inspection will be required. Please notify us when your installation is completed (ph. 533-6108) so an inspection can be performed.

Taux Opposituativ Employee

if after initial inspection and stack test approval of this plant, you desine to temporarily relocate within the State, we require another notice of intent be given for each relocation and start-up time. Temporary relocations of this type do not require a 30 day public notice period but do require an inspection for compliance with conditions 1, 3 and 4.

Sincerely,

长的步

Brent C. Bradford
Executive Secretary
Utah Air Conservation Committee

LCB: job

cc: Weber-Morgan District Health Dept. EPA/Region VIII (N. Huey)



GARY R. HERBERT Governor

SPENCER J. COX Lieutenant Governor

Γ irtment of **Environmental Quality**

Alan Matheson Executive Director

DIVISION OF AIR QUALITY Bryce C. Bird Director



DAQE-GN109810004-15

December 4, 2015

Carl Clyde Geneva Rock Products 730 North 1500 West Orem, UT 84057

Dear Mr. Clyde:

RE:

Notification of Company Name and Ownership Change for AO DAQE-809-00 dated December 22, 2000 Wilkinson Construction - Morgan Drum Mix Asphalt Plant & Crushing Operation

Project Number: N10981-0004

The Utah Division of Air Quality (DAQ) has received your request on November 18, 2015 for a name and ownership change for the holder of the above-referenced Approval Order (AO). According to your request, we have noted in our records that the holder and party responsible for complying with the terms and conditions contained in the above-referenced AO has been changed to 'Geneva Rock Products'. This change took effect on the date of this letter.

The charge for the review done in making this change is a flat fee plus a filing fee as authorized by the Utah Legislature. You will receive an invoice for these charges shortly. If you have any questions, please contact Mr. Maung Maung, who may be reached at (801) 536-4153.

Sincerely,

Bryce C. Bird

Director h D. Thyshor

Alan D. Humpherys, Manager

New Source Review Section

ADH:MM:jc



DEC. D. 9 2015

J. O. A. W.

DIVISION OF AIR QUALITY

December 8, 2015

Utah Department of Environmental Quality Division of Air Quality 195 North 1950 West Salt Lake City, Utah 84114

RE: Submission of "Ownership Change/Company Name Change Notification" Form

Dear Sirs/Madam:

Geneva Rock Products recently purchases Wilkinson Construction located in Morgan, Utah. The Ownership Change/Company Name Change Notification form has been signed by authorized representatives for both companies. The original signed form is attached.

If you have any questions regarding the attached information, please feel free to call me at the number provided below.

Sincerely.

Samuel Bernard

Environmental Specialist

Geneva Rock Products

801.802.6954



State of Utah

GARY R. HERBERT Governor

SPENCER J. COX Lieutenant Governor

epartment of Environmental Quality

Alan Matheson
Executive Director

DIVISION OF AIR QUALITY Bryce C. Bird Director



DAQE-GN109810005-16

January 8, 2016

Samuel Bernard Geneva Rock Products 730 North 1500 West Orem, UT 84057

Dear Mr. Bernard:

RE:

Notification of Company Name and Ownership Change for Approval Order dated August 6, 1980

Drum Mix Asphalt Plant, Barber Greene Model DM-50

Project Number: N10981-0005

The Utah Division of Air Quality (DAQ) has received your request on December 10, 2015 for a name and ownership change for the holder of the above-referenced Approval Order (AO). According to your request, we have noted in our records that the holder and party responsible for complying with the terms and conditions contained in the above-referenced AO has been changed to 'Geneva Rock Products'. This change took effect on the date of this letter.

The charge for the review done in making this change is a flat fee plus a filing fee as authorized by the Utah Legislature. You will receive an invoice for these charges shortly. If you have any questions, please contact Mr. Maung Maung, who may be reached at (801) 536-4153.

Sincerely,

Bryce C. Bird

Director

Alan D. Humpherys, Manager

New Source Review Section

BCB:ADH:MM:jc



Chad Gilgen <cgilgen@utah.gov>

Geneva Rock Products- Morgan Asphalt-Facility Visit

Sam Bernard <sbernard@clydeinc.com> To: Chad Gilgen <cgilgen@utah.gov>

Fri, May 20, 2016 at 8:38 AM

Chad,

Attached are the requested documents and responses to the facility visit by the Utah Division of Air Quality on May 12th 2016.

#8.A Asphalt Production = See Attachment

#8.B Aggregate Production= During the past 12 Months no aggregate was produced at the facility.

#9 Baghouse Calibration= The bag house was calibrated on May 19th. With the purchase of the facility, we have updated the previous plant control monitoring system with a new one as of last month.

#11 Monthly Recycled Asphalt (Rap) Quantities= See Attachment

#12 Watering Records= See attachment

#15 Low Sulfur Certification for diesel used onsite= See Attachment*

The attachment is a current receipt from Christensen Oil for the Logan tank. Fuel is transferred from tank to tank via a fuel truck. Please disregard the delivery location and see checked row and column Diesel fuel #2. Also note the red box checked at the bottom.

In response to the 2016 stack testing date for the plant. American Environmental has been contacted and they are in the process of generating a testing protocol to submit to DAQ for the CMI plant. Once a date has been established, I will contact you and let you know when it has been approved by the state and when it is scheduled. We are planning to have the unit tested within the next 2 months.

Feel free to contact me if any additional information is needed.

Thanks again,

Sam

Samuel Bernard

Environmental Specialist

sbernard@clydeinc.com

Office: 1-801-802-6954

Mobile: 1-801-623-7750

CLYDE COMPANIES

4 attachments

AO Report Rolling 12 Totals - Morgan.pdf

Fuel 15ppm.pdf 1109K

Manometer Calibration.pdf 24K

Watering Logs.pdf 1056K

2,261	2,261	0	8,581	8,581	0	Dec-16	
2,261	2,261	0	8,581	8,581	0	Nov-16	
2,261	2,912	0	8,581	10,993	0	Oct-16	
2,261	5,849	0	8,581	23,539	0	Sep-16	
2,261	8,735	0	8,581	48,546	0	Aug-16	
2,261	11,854	0	8,581	76,918	0	Jul-16	
2,261	11,854	0	8,581	78,683	0	Jun-16	
2,261	11,854	2,226	8,581	79,369	8,564	May-16	
35	9,628	35	17	70,805	12	Apr-16	1
0	9,593	0	0	70,788	0	Mar-16	
0	9,593	0	0	71,926	0	Feb-16	
0	9,593	0	0	71,926	0	Jan-16	2016
9,593	9,593	0	71,926	71,926	0	Dec-15	
9,593	9,593	650	71,926	71,926	2,412	Nov-15	
8,942	8,942	2,937	69,514	70,926	12,546	Oct-15	
	6,005		56,968	61,433	25,007	Sep-15	
3,119	3,119	3,119	31,962	42,981	28,372	Aug-15	
0	0	0	3,590	20,319	1,765	Jul-15	and a share or regar
0	0	0	1,825	18,554	686	Jun-15	
0	0	0	1,138	17,867	0	May-15	
0	0	0	1,138	17,867	0	Apr-15)
0	0	0	1,138	17,867	1,138	Mar-15	
0	0	0	0	16,729	0	Feb-15	
0	0	0	0	16,729	0	Jan-15	2015
YTD Total	Rolling 12 Months	Monthly Total	YTD Total	Rolling 12 Months	Monthly Total	Date	Year
ent (Tons)	Recycled Asphalt Pavement (Tons)	Recycled .	Tons)	Asphalt Production (Tons)	Aspha		
	Tons	XXXXXX		Tons / 12m	: XXXXXX	Permitted For: XXXXXX	

Geneva Rock Products, Inc. Gravel and Asphalt Materials Division Morgan Asphalt Plant

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		Aspha	Asphalt Production (Tons)	Tons)	Recycled	Recycled Asphalt Pavement (Tons)
Year	Date	Monthly Total	Rolling 12 Months	YTD Total	Monthly Total	Rolling 12 Months
2015	Jan-15	0	16,729	0	0	0
	Feb-15	0	16,729		0	0
	Mar-15	1,138	17,867	1,138	0	0
	Apr-15	0	17,867	1,138		0
	May-15	0	17,867	1,138		0
	Jun-15	686	18,554	1,825	0	0
	Jul-15	1,765	20,319	3,590	0	0
	Aug-15	28,372	42,981	31,962	3,119	3,119
	Sep-15	25,007	61,433	56,968		6,005
	Oct-15	12,546	70,926	69,514	2,937	
	Nov-15	2,412	71,926	71,926	650	9,593
	Dec-15	0	71,926	71,926	0	9,593
2016	Jan-16	0	71,926	0	0	9,593
	Feb-16	0	71,926	0	. 0	9,593
	Mar-16	0	70,788	0	0	9,593
	Apr-16	108	70,896	108	35	9,628
	May-16	8,564	79,460	8,672	2,2	11,854
	Jun-16	0	78,773	8,672		11,854
	Jul-16	0	77,008	8,672	0	11,854
	Aug-16	0	48,636	8,672	0	8,735
	Sep-16	0	23,630	8,672	0	5,849
	Oct-16	0	11,084	8,672	0	2,912
	Nov-16	0	8,672	8,672	0	2,261
	Dec-16	0	8,672	8,672	0	2,261



Chad Gilgen <cgilgen@utah.gov>

FW: AO Report Morgan

2 messages

Sam Bernard <sbernard@clydeinc.com> To: Chad Gilgen <cgilgen@utah.gov>

Wed, Jun 22, 2016 at 3:19 PM

Chad,

I spoke with the plant manager this morning regarding the HMA plant virgin and RAP asphalt. In April we operated the plant for one day. Please see attached corrections.

Thanks,

Sam

From: Daniel Matthews

Sent: Wednesday, June 22, 2016 9:27 AM To: Sam Bernard <sbernard@clydeinc.com>

Subject: AO Report Morgan

Sam,

We only ran one day in April. The Asphalt Production tons was incorrectly entered as 17 instead of 108.07, see below. I apologize for the confusion. See attached for the revised Morgan Asphalt Plant documentation.

	Asphalt Prod	
Date	(Tons)	RAP Tonnage
4/1/2016		0.00
4/2/2016		0.00
4/3/2016		0.00
4/4/2016		0.00
4/5/2016		0.00
4/6/2016		0.00
4/7/2016		0.00
4/8/2016		0.00
4/9/2016		0.00
4/10/2016		0.00
4/11/2016		0.00
4/12/2016		0.00
4/13/2016		0.00
4/14/2016		0.00
4/15/2016		0.00
4/16/2016		0.00
4/17/2016		0.00
4/18/2016		0.00
4/19/2016		0.00
4/20/2016		0.00
4/21/2016		0.00
4/22/2016		0.00
4/23/2016		0.00
4/24/2016		0.00
4/25/2016		0.00
4/26/2016		0.00
4/27/2016		0.00
4/28/2016	1	0.00
4/29/2016	108.07	34.99
4/30/2016		0.00
		0.00
TOTALS	108.07	34.99

Please let me know if you need anything else.

Thank you,



DANIEL MATTHEWS, PE

Asphalt Production Manager

Geneva Rock Products, Inc.

Cell

801-420-2573

Office 801-281-7820 www.genevarock.com

2 attachments





2016-05 AO Report Rolling 12 Totals - Morgan.pdf 13K

Chad Gilgen <cgilgen@utah.gov> To: Sam Bernard <sbernard@clydeinc.com> Thu, Jun 23, 2016 at 1:22 PM

Hi Sam,

Thanks for letting me know. It looks like the warning letter has already been mailed out but this email covers anything referenced there. I'll make sure this makes it into my memorandum.

Thanks again, Chad

Chad Gilgen | Environmental Scientist | Minor Source Compliance 801.536.4237 (office)



195 North 1950 West, Salt Lake City, UT 84116 [Quoted text hidden]



State of Utah

GARY R. HERBERT Governor

SPENCER J. COX Lieutenant Governor

Department of Environmental Quality

Alan Matheson Executive Director

DIVISION OF AIR QUALITY Bryce C. Bird Director

> DAQC-889-16 Site ID 10981 (B1)

June 22, 2016

Sent Via Certified Mail No. 70123460000050908311

Sam Bernard Geneva Rock Products 730 North 1500 West Orem, UT 84057

Dear Mr. Bernard:

Re: Warning Letter - Geneva Rock Products fka Wilkinson Construction Co.

On May 12, 2016, the Utah Division of Air Quality (DAQ) conducted an inspection of the Geneva Rock Products fka Wilkinson Construction Co. operation in Morgan County, Utah. The DAQ believes that Geneva Rock Products was in violation of Condition 11 of DAQE-809-00 for exceeding the 40% limit of recycled asphalt product in April 2016.

Please be aware this letter is a warning and that future instances of noncompliance may be considered violations of DAQE-809-00 and Geneva Rock Products may be assessed penalties up to \$10,000 per day if found to be in violation of Utah Air Quality Rules.

A response to this letter is not required. If you have any questions regarding this letter, please contact Jay Morris at (801) 536-4079 or at jpmorris@utah.gov.

Sincerely,

Bryce C. Bird

Director

JPM:CG:bp

cc: Weber-Morgan Health Department

Document Date 6/22/2016

195 North 1950 West • Salt Lake City, UT
Mailing Address: P.O. Box 144820 • Salt Lake City, UT 84114-4820
Telephone (801) 536-4000 • Fax (801)536-4099 • T.D.D. (801) 903-3978

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PLANT BAG HOUSE ANNUAL RECALIBRATION

DATE 19 May 2016	
PLANT NUMBER 587 72-2004	,
MECHANIC Clint Wells	
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CORRECTION NEEDED YES NO	
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- Return original to Mike Edwards In Care of Tiffany Hunt at POM - Keep ti
- Fill out COMPLETELY for each load or shift
- Call Mike Edwards (801) 641-2117 with any questions or concerns.



Our Environmental Policy

Geneva Rock Products, Inc. is dedicated to Havironmental Leadership. Our fundamental principles are:

Stewardship: We will conduct our activities as an example of responsible environmental stewardship. Protecting the health of our employees, the Comply:—Our goal is, 100% compliance, 100% of the time. We will
manage our business activities to meet all applicable laws and regulations ublic, and the environment is our responsibility.

Perpetual Improvament: We strive to continually evaluate, innovate and improve our environmental and business performence.



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Our Environmental Policy

- Return original to Mike Edwards in Care of Tiffany Hunt at POM

Fill out COMPLETELY for each load or shift

Call Mike Edwards (801) 641-2117 with any questions or concerns

- Keep this record with the vehicle and submitt WEEKLY

Geneva Rock Products, Loc. is designed to Environmental Leadership. Our fundamental principles are:

• Comply:—Our goal is, 100% compilares, 100% of the time. We will manage our business activities to meet all applicable laws and regulations.
• Sterrardslipt We will conduct our activities as an example of responsible environmental sterrardship. Protecting the health of our employees, the public, and the environment is our responsibility.

 Perpetual Improvement: We strive to continually evaluate, innovate and improve our environmental and business performance.



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- Return original to Mike Edwards in Care of Tiffany Hunt at POM
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- Call Mike Edwards (801) 641-2117 with any questions or concerns.



Our Environmental Policy

Geneva Rock Products, Inc. is dedicated to Environmental Leadership. Our fundamental principles are:

•Comply:—Our goal is, 100% compliance, 100% of the time. We will manage our business activities to meet all applicable laws and regulations. element-leafur We will conduct our activities as an example of responsible auxionamental stewardship. Protecting this helse as an example of responsible public, and the environment is our responsibility.

 Perpetual Improvement: We strive to continually evaluate, innovate and improve our environmental and business performance.

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Our Environmental Policy

Geneva Rock Products, Inc. is dedicated to Environmental Leadership. Our fundamental principles are:

Stewardship: We will conduct our activities as an example of responsible cavironmental stewardship. Protecting the health of our employees, the Comply:—Our goal is, 100% compliance, 100% of the time. We will
menage our business activities to meet all applicable laws and regulations public, and the environment is our responsibility.

- Return original to Mike Edwards In Care of Tiffany Hunt at POM

- Keep this record with the vehicle and submitt WEEKLY

Fill out COMPLETELY for each load or shift

- Call Mike Edwards (801) 641-2117 with any questions or concerns.

Perpetual Improvement: We strive to continually evaluate, innovate and improve our environmental and business performance.



Truck No: Location: 587 WIKANSON PIT

Operator: Keusal (Jarbu

Date Range of Record: 5-9-16 - 5-18-16

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Parpetual Improvement: We strive to continually evaluate, impovate and improve our environmental and business performance.



Truck No: 12 - 2089

Operator: Ton B.

Date Range of Record: 5-13-12-

	WEEK ONE													
											5-13-16	8-13-16	5-13-16 10:00 Am	Date.
											4:0000	1.00 pm	10:00 Am	Start Time
			-1	à =-			,				5:00 P.m.	2:00	11:00	End Time
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☐Yes ☐No ·	☐Yes ☐No	⊡Yes □No	☐Yes ☐ No	☐Yes ☐No	∏Yes ∏No	∏Yes ∏No	Yes □ No	⊡Yes □No	∏Yes □No	∐Yes □No	∑Yes □No	Yes □No	∑Yes □No	Temp. Above 32° Yes/ No
☐Yes ☐No	∏Yes □No .	□Yes □No	☐Yes ☐No .	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes · ☐No	☐Yes· ☐No	∏Yes □No .	☐Yes ☐No	□Yes PANO	□Yes Into	∏Yes ⊠No	Wind Above 25 mph Yes/No

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Complique. Our goal is, 100% compliance, 100% of the time. We will
manage our business activities to meet all applicable laws and regulations.
 Stewardship: We will conduct our anivoities as an example of responsible
conformacial istewardship. Protecting the health of our employees, the
public, and the environment is our responsibility.

 Perpetual Imprevement: We strive to continually evaluate, innovate and improve our environmental and business performance.

Low Sulfur Certification



CHRISTENSEN OIL

595 SOUTH 200 EAST PROVO, UTAH 84606-4850 **PHONE 373-7970** S.L.C. 328-3558

210085 **TOLL FREE 800-654-0438** FOR CHEMICAL EMERGENCY SPILL, LEAK, FIRE OR ACCIDENT CALL PERS 1-800-633-5253 CASH RESELLER FARM USE CHARGE TAX EXEMPT OFF ROAD ZI-ADR SOLD TO **DELIVERED TO** # 69-2073 MAIL ADDRESS **DELIVERED BY** PURCHASE ORDER NO. 358622 QUANTITY PRICE AMOUNT GASOLINE, 3, UN1203 PG II PREMIUM UNLEADED GASOLINE GASOLINE, 3, UN1203 PG II UNLEADED PLUS GASOLINE GASOLINE, 3, UN1203 PGII UNLEADED REGULAR GASOLINE ULTRA-LOW SULFUR DIESEL FUEL OIL COMBUSTIBLE LIQUID, 15ppm Max DIESEL FUEL #2 NA 1993 PG III I Readed 5008 DYED ULTRA-LOW SULFUR DIESEL FUEL OIL 15ppm Max COMBUSTIBLE LIQUID DIESEL FUEL #2 NA 1993 PG III ULTRA-LOW SULFUR DIESEL FUEL OIL COMBUSTIBLE LIQUID 15ppm Max DIESEL FUEL #1 NA 1993 PG III DYED ULTRA-LOW SULFUR DIESEL FUEL OIL 15ppm Max COMBUSTIBLE LIQUID DIESEL FUEL #1 NA 1993 PG III FUEL, AVIATION, COMBUSTIBLE LIQUID JET FUEL TYPE A UN1863 PG III PETROLEUM COMBUSTIBLE LIQUID SOLVENT UN 1255 PG III F.E.R. FEE **UTAH ENVIRONMENT FEE** F.E.T. UTAH MOTOR FUEL TAX SALES TAX % PRICES AND EXTENSIONS SUBJECT TO CORRECTION, FEDERAL, STATE, AND LOCAL TAXES (IF APPLICABLE) INCLUDED IN PRICE OF GASOLINE. 1 DYED ULTRA-LOW SULFUR DIESEL FUEL; NON-TAXABLE USE ONLY; PENALTY FOR TAXABLE USE. 5/2. ULTRA-LOW SULFUR DIESEL FUEL; DOES NOT NOT CONTAIN VISIBLE EVIDENCE OF DYE. REC'D GOODS ISIGNATURE OF PURCHASER OR AUTHORIZED REPRESENTATIVES LISTED ABOVE X A 2% PER MONTH FINANCE CHARGE (ANNUAL PERCENTAGE RATE 24%) WILL BE MADE ON ALL AMOUNTS DUE 30 DAYS OR MORE. PURCHASER AGREES TO PAY ATTORNEY FEES, LEGAL COSTS, AND ALL EXPENSES INVOLVED IN THE EVENT LEGAL ACTION IS NECESSARY FOR THE COLLECTION OF THIS INVOICE. YOUR SIGNATURE HEREUNDER

CONSTITUTES ACCEPTANCE OF THIS PROPOSAL. THIS IS TO CERTIFY THAT THE HEREIN NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.



Chad Gilgen <cgilgen@utah.gov>

Administrative Amendment

1 message

Chad Gilgen <cgilgen@utah.gov> To: Alan Humpherys <ahumpherys@utah.gov> Thu, Jun 16, 2016 at 3:48 PM

Hello Alan,

Per our discussion a few moments ago, Approval Order DAQE-809-00, dated December 22, 2000, condition #6 states: "Stack testing to show compliance with the emission limitations stated in Condition #9 shall be performed as specified below:"

Condition #5 is the condition specifying emission limitations.

Additionally, this source was purchased by Geneva Rock Products in 2015. DAQ sent them a letter on December 4, 2015, acknowledging receipt of the company name change request. That document number is DAQE-GN109810004-15.

Let me know if you have any questions or need additional information.

Thanks! Chad

Chad Gilgen | Environmental Scientist | Minor Source Compliance 801.536.4237 (office)



195 North 1950 West, Salt Lake City, UT 84116



UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY

DIVISION OF AIR QUALITY

June 20, 2016

Utah Department of Environmental Quality
Division of Air Quality
Att: Compliance Section
Jay Morris and Chad Gilgen
195 North 1950 West
Salt Lake City, Utah 84114

REVIEWED

Initials: C6 Date: 6-28-16

Compliance Status: In Compliance

File# SHE ID #10981

RE: Geneva Rock Products, Approval Order DAQE-809-00- Morgan, Utah.

Dear Compliance Section:

In the Fall of 2015 Geneva Rock Products purchased Wilkinson Construction Co. in Morgan, Utah. A letter was sent to the Department of Environmental Quality notifying the Department of the transfer of ownership. A letter was sent acknowledging the state has received the letter. After the purchase of the facility, Geneva Rock Products notified/self-reported that they may be in violation due to pieces of equipment that were on the property that may have been in operation prior to the purchase. Since then, Geneva has placed these pieces of equipment in a storage area at the facility. These pieces of equipment are currently not in use.

Now that a full audit of assets acquired in the purchased of the company and facility has been completed, Geneva will submit a replacement in kind for equipment that they intend on using. If you have any questions regarding this matter, please feel free to call me at the number provided below.

Sincerely,

Samuel Bernard

Environmental Specialist

Geneva Rock Products

801.802.6954

sbernard@clydeinc.com