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May 8, 2025

Via E-Mail

Valerie Armento, Esq.
Chair of the Hearing Board
Bay Area Air Quality Management District
375 Beale Street Suite 600
San Francisco, CA 94105
mhiratzka@baaqmd.gov

Re: Argent Materials, Inc.'s Petition for Appeal for Denial of Permit Application No. 30122 (8501 San Leandro Street, Oakland, California)

Dear Chair Armento:

On behalf of Argent Materials, Inc. we hereby file the enclosed Petition for Appeal of the denial of Permit Application No. 30122 by the Bay Area Air District based on an Engineering Evaluation dated April 9, 2025, and delivered to Argent Materials via email on April 10, 2025.

Argent respectfully requests that the Hearing Board set Argent's appeal for a hearing within 30 days of the filing of this Petition pursuant to Rule 8.1(e)(3).

Thank you for your consideration of this matter.

Sincerely,

Martin P. Stratte

Enclosure
cc: Argent Materials, Inc.
Omonigho Oiyemhonlan, Assistant Counsel, Bay Area Air District

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BAY AREA AIR DISTRICT HEARING BOARD

Argent Materials, Inc.,

Appellant,

v.

Bay Area Air District,

Appellee.

ARGENT MATERIALS, INC.'S PETITION FOR APPEAL OF DENIAL OF PERMIT APPLICATION NO. 30122

Hunton Andrews Kurth LLP
50 California Street, Suite 1700
San Francisco, California 94111

I. ACTIONS BEING APPEALED

Argent Materials, Inc. (Argent) hereby appeals the denial of Permit Application No. 30122 by the Bay Area Air District (BAAD or District) based on an Engineering Evaluation dated April 9, 2025, and delivered via email on April 10, 2025.[1]

Argent petitions the BAAD Hearing Board (Board) to set Argent's appeal for a hearing within 30 days of the filing of this Petition for Appeal pursuant to Rule 8.1(e)(3).

II. DISTRICT'S GROUNDS FOR DENIAL

The District asserted the following two grounds as its basis for denial of Application No. 30122:

(1) Argent improperly divided a "project" into two permit applications in violation of Regulation 1-104; and

(2) The Health Risk Assessment for Permit Application No. 30122 exceeds the 1.0 chronic Hazard Index value, prohibiting approval of the application under Regulations 2-5-302 and 5-2-216.

III. ARGENT'S GROUNDS FOR APPEAL

Argent disputes both of the District's two grounds for denial and asserts as a basis for this appeal that:

(1) Argent did not improperly divide a "project" into two permit applications or otherwise attempt to circumvent the District's permit regulations in violation of Regulation 1-104; and

(2) The Health Risk Assessment does not prohibit approval of Application No. 30122 under Regulations 5-2-302 or 5-2-216.

IV. LEGAL STANDARD

The petitioner has the burden of proof to demonstrate that the District's "action was erroneous." Hearing Board Rule 8.4.

The Hearing Board will determine whether the District's interpretation of the applicable legal requirements is "is fair and reasonable and consistent with other actions of the [District]." Hearing Board Rule 8.6.

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[1] *See* Exhibit 1.

V. BACKGROUND

Argent conducts activities at two properties within the District's jurisdiction. The two properties and their permitting histories are summarized below.[2]

A. 8300 Baldwin Street

The first Argent property is a concrete and asphalt recycling facility located at 8300 Baldwin Street, Oakland, California 94621 ("8300 Site").

At the 8300 Site, large pieces of post-consumer concrete and asphalt are crushed to create finished aggregate that is sold to third parties for use as building materials.

In 2017, the District issued a permit for Plant No. 22474 to Argent authorizing the operation of the 8300 Site with a raw aggregate throughput of 500,000 tons per year (tpy).

On April 5, 2019, Argent filed Permit Application No. 29851, seeking to increase the total amount of raw aggregate processed at the 8300 Site from 500,000 tpy to 1,000,000 tpy.

On June 5, 2019, the District deemed the application complete.[3] On June 7, 2019, the District issued Argent a permit to process 1,000,000 tpy of aggregate at the 8300 Site.[4] The District renewed this permit in 2020, 2021, and 2022.

On September 19, 2023, the District notified Argent that Permit Application No. 29851 had allegedly been erroneously granted in 2019 and without explanation reissued the 2017 permit with a throughput of 500,000 tpy.[5] The District then began reprocessing Permit Application No. 29851.

On April 9, 2025, the District denied Application 29851 for the 8300 Site for the two reasons listed above on page 1, as discussed in the Engineering Evaluation attached as Exhibit 1.

Argent does not intend to appeal the denial of Application No. 29851, but Argent continues to disagree with the District's attempt to revise the previously issued 2019 permit authorizing a throughput of 1,000,000 tpy on the basis of an alleged mistake.

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[2] *See* Exhibit 2. The Argent operations are collectively referred to by the District as Plant No. 22474.
[3] *See* Exhibit 3.
[4] *See* Exhibit 4.
[5] *See* Exhibit 5.

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B. 8501 San Leandro Street

The second Argent property is located at 8501 San Leandro Street, Oakland, California 94621 ("8501 Site").

On September 9, 2019, Argent filed Permit Application No. 30122 (at issue in this appeal) seeking a permit to operate stockpiles at the 8501 Site.[6] Application No. 30122 was not deemed complete or processed by the District for more than five years after the application was filed. At one point, the District attributed its delay to its lack of staff resources stating "the main issue is engineering time and resources, sorry."[7]

On April 9, 2025, the District denied Application No. 30122 for the two reasons listed above on page 1, as discussed in the Engineering Evaluation attached as Exhibit 1. Argent now is appealing the District's denial of Application No. 30122.

The 8501 Site is not currently operating pending issuance of a permit. In July 2023, the District alleged that Argent had operated a stockpile of aggregate materials without a permit to operate in violation of Regulation 2-1-301 and 2-1-302. Argent denies any wrongdoing. The matter is subject to ongoing discussion between the District and Argent and is not relevant to the Hearing Board's adjudication of the two issues on which the District based its denial of Application No. 30122.

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[6] *See* Exhibit 6.
[7] *See* Exhibit 7.

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VI. SUMMARY OF ARGUMENT

On April 9, 2025, the District issued an Engineering Evaluation denying both Permit Application Nos. 29851 and 30122, treating the two separate applications as a single "project" and asserting without any evidence that the filing of two applications was an attempt to circumvent the District's regulations, in particular Rule 2-5-216. The District based its denial of Application No. 30122 on the two grounds listed above. *See* Exhibit 1.[8]

A. Argent Did Not Improperly Divide A "Project" Into Two Permit Applications In Violation Of Regulation 1-104

The District denied Permit Application No. 30122 because "Argent piecemealed its expansion project for permitting purposes in violation of Regulation 1-104, which prohibits permit applicants from dividing a project into separate permit applications to evade or circumvent Air District rules or regulations."

The District's conclusion is predicated on what it refers to in the Engineering Evaluation as the "expansion project." The District characterizes the activities proposed in Application Nos. 30122 and 29851 as a single "expansion project." The District alleges that Argent should have submitted "one comprehensive permit application" for its activities at both the 8300 Site and the 8501 Site—i.e., the so-called "expansion project." The District's allegations in the Engineering Evaluation read as if Argent tried to process two separate permit applications at the same time in order to piecemeal a single project. But that's not what happened.

The District's assertion ignores the fact that the District first approved Application No. 29851 for the 8300 Site on June 7, 2019, three months before Argent filed Application No. 30122 on September 9, 2019 for the 8501 Site. Application No. 30122 was largely ignored by the District for approximately three years until 2022, when after repeated inquiries it recommenced processing the request. Then, in September 2023, the District tried to turn back the hands of time and abruptly decided to begin reprocessing Permit Application No. 29851, which was previously approved in 2019 for 1,000,000 tpy. It reissued the permit for Plant No. 22474 at a reduced throughput of

[8] Argent reserves the right to supplement its analysis and evidence in a brief to be filed prior to the hearing on its Petition.

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500,000 tpy on the asserted basis that Permit Application No. 29851 had erroneously been issued, and then renewed annually, for four years. While the District may assert that the original issuance of the increased throughput was an accident, it cannot argue that Argent simultaneously filed two applications for a single project in order to circumvent the District's regulations.

Argent maintains that the two facilities are separate and distinct operations. But at no time during the nearly six years that it took the District to act on Permit Application No. 30122 did Argent attempt to prevent the District from applying its rules or analyzing the combined emissions from the two sites. Far from trying to circumvent the District's rules, Argent diligently supplied the information the District needed to conduct the analyses that the District has now relied on to deny the permit.

Argent did not violate Regulation 1-104 or any other District regulation when it filed Permit Application No. 30122. At the time Argent filed Permit Application No. 30122, Argent reasonably believed the District had already approved Application 29851 and would process its new application under its rules.

The only reason Argent had two applications pending on April 10, 2025, the date when the District informed Argent that Applications 30122 and 29851 had been denied, is the District's pursuit of a "do-over" four years after it first approved the increased throughput at the 8300 Site, not because Argent sought to divide a single "expansion project" into separate applications. The District minimizes the significance of its decision to retract the approved 2019 permit after four years by relegating it to a footnote on page 4 of the Engineering Evaluation. But it's far more than a footnote. It's a critical part of the story.

The District's conclusion that Argent attempted to circumvent the District's rules is clearly erroneous. It is neither fair nor reasonable to impose on Argent the expectation that it will not file a new application for a newly leased property (8501 Site) because an application for a modification to an existing operation (8300 Site) had been approved several months earlier.

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B. The District Erroneously Applied Rule 2-5-216 When it Calculated The Chronic Hazard Index Value for the 8501 Site.

The District used its flawed "piecemealing" argument discussed above to bootstrap its second stated basis for denying Permit Application No. 30122 and to lay the foundation for a flawed approach to the Health Risk Assessment (HRA) for the two Argent facilities.

The District asserts that the "new and modified sources proposed" in Application Nos. 30122 and 29851 were "all part of the same 'project' as defined in Regulation 2-5-216." But the District's conclusion and the HRA based thereon are not consistent with the plain language of Regulation 2-5-216.

In conducting the HRA for Application 30122, the District modeled the chronic Hazard Index value using the 600,000 tpy throughput request in Application No. 30122 for the 8501 Site and the 1,000,000 tpy throughput request in Application No. 29851 for the 8300 Site. The District claims it did so because the 8300 Site and the 8501 Site are one "project" under Regulation 2-5-216. The District has incorrectly applied its regulation.

First, as explained above, the 1,000,000 tpy throughput increase and the new operation at the 8501 Site were not included in a single permit application; the District unilaterally combined the permit applications after it reversed its initial 2019 approval of Application No. 29851.

Second, Rule 2-5-216 specifically provides a mechanism to ensure applicants do not circumvent the regulations through piecemealing by requiring the District to include in the HRA sources of TACs *that have been permitted* in the five years preceding the complete application, not sources of TACs *that have been requested*.

Regulation 2-5-216 defines a "Project" as follows:

> Any source, or group of sources, at a facility that: (a) is part of a proposed construction or modification, (b) is subject to the requirements of Regulation 2-1-301 or 302, and (c) emits one or more toxic air contaminants. All new or modified sources of TACs ***included in a single permit application*** will be considered as a project. . . . In addition, in order to discourage circumvention that might be achieved by breaking a project

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> into smaller pieces and submitting more than one permit application over a period of time, a project shall include those new or modified sources of TACs at a facility ***that have been permitted within the five-year period*** immediately preceding the date a ***complete*** application is received, and any projects at that facility where an Authority to Construct ***has been issued*** and has not expired. Rule 2-5-216 (emphasis added).

According to the District, the last permit received by Argent for either of its sites was issued in 2017 and reflects a permitted throughput of 500,000 tpy. According to the District, Argent was never permitted for a 1,000,000 tpy throughput at the 8300 Site. Thus, to the extent the five year "look back" shown above in boldface applies and includes the original 2017 permit to operate the 8300 Site, the District should have calculated the chronic Hazard Index using the *permitted* 500,000 tpy throughput for the 8300 Site, not the 1,000,000 tpy throughput *request* that was never approved. This would have brought the chronic Hazard Index value below the 1.0 threshold allowing the District to approve Application 30122.

In the same April 9, 2025 Engineering Evaluation in which the District denied Application No. 30122, the District also denied the requested increase at the 8300 Site in Application No. 28851. The District cannot have it both ways: it cannot rely on the theoretical future throughput of 1,000,000 tpy for the 8300 Site in Application No. 28851 to deny Application No. 30122 for the 8501 Site, while at the same time denying that same requested increase in throughput in Application No. 28851.

Only by bundling the two applications into one using its unsupported "piecemealing" argument could the District deny these two applications in one fell swoop. A fair and reasonable approach would have been to grant Application No. 30122 and deny Application No. 29851 if the HRA exceeded the permitting standards. Or, consistent with its usual practice, include a permit condition for a lower throughput that would have brought the operations within the permitting standard. Despite the fact that the District had the modelling results before it to support either approach, neither happened here. And after waiting for six years for the District to act on simple permit applications, Argent had both applications denied.

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VII. PRELIMINARY PLAN FOR PRESENTATION OF EVIDENCE AT HEARING

Argent plans to put forth testimony from at least two participating witnesses, as discussed below, and reserves the right to call additional witnesses. Agent also anticipates it will have cross-examination for the District's witnesses, including the permit engineer(s) responsible for processing Application No. 30122.

A. Mr. William Crotinger, President, Argent Materials, Inc.

Mr. Crotinger will testify as a fact witness on issues related to Argent's operations at the 8300 Site and at the 8501 Site, among other things.

B. Ms. Sarah Manzano, Senior Managing Consultant, Ramboll

Ms. Manzano will testify as both a fact witness based on her experience assisting Argent with the above referenced permit applications, and as an expert witness based on her experience as a professional air quality engineer and regulatory specialist with years of experience practicing in the Bay Area.

VIII. PRAYER FOR RELIEF

WHEREFORE, Argent prays for relief as follows:

1. The Hearing Board grant this appeal for the reasons stated herein;
2. The Hearing Board remand Application 30122 to the District for further evaluation for the reasons stated herein; and
3. For such other and further relief as the Board determines proper.

DATED: May 8, 2025

HUNTON ANDREWS KURTH LLP

By: _____
Martin P. Stratte
Attorneys for Argent Materials, Inc.

Hunton Andrews Kurth LLP
50 California Street, Suite 1700
San Francisco, California 94111

Bay Area Air District

CLEAN AIR FOR ALL

Ex. 1

April 9, 2025

VIA ELECTRONIC MAIL

Argent Materials, Inc.
Attn: Bill Crotinger and Matt Chasm
8300 Baldwin St.
Oakland, CA 94621
bill@argentmaterials.com
matt@argentmaterials.com

RE: Denial of Permit Application Nos. 29851 and 30122 (Plant No. 22474)

Dear Applicant:

This letter is to notify you that Permit Application Nos. 29851 and 30122 have been denied.

In 2019, Argent Materials, Inc. (Applicant) submitted Permit Application Nos. 29851 and 30122 to the Bay Area Air Quality Management District (Air District) to: double the Facility's stockpiling and processing limit for raw aggregate from 500,000 to 1,000,000 tons per year, increase the amount of finished aggregate that the Facility stockpiles from 500,000 to 1,600,000 tons per year, and expand its physical location to include a new storage and overflow yard for finished aggregate that is adjacent to the Facility's aggregate processing yard (collectively, "expansion project").

The Air District denied Argent's permit applications for two reasons. First, Argent sought authorization for the expansion project by submitting separate permit applications for new and modified sources in violation of Regulation 1-104, which prohibits permit applicants from dividing a project into separate permit applications to evade or circumvent Air District rules or regulations. Per Regulation 2-1-304, the Air District shall deny any permit application that does not comply with applicable regulatory requirements, including Regulation 1-104.

Second, the Air District conducted a Health Risk Assessment to determine whether the expansion project's toxic emissions comply with the toxic health risk limits prescribed in Regulation 2-5. The results of the Health Risk Assessment show the expansion project has a chronic Hazard Index value of 1.2, which indicates that long-term exposure to the project's toxic emissions has the potential to cause adverse health effects. Per Regulation 2-5-302, the Air District is prohibited from approving permit applications for a project with a chronic Hazard Index value that exceeds 1. Accordingly, the Air District must, and hereby does, deny Permit Application Nos. 29851 and 30122 pursuant to Air District Regulations 1-104; 2-1-304; and 2-5-302.

You have the right to appeal this decision in accordance with Regulation 2-1-410. If you wish to appeal, you must submit a written request to the Air District's Hearing Board within 30 days of receipt of this letter. If you have any questions regarding the appeal procedure, you may contact Marcy Hiratzka, Clerk of the Boards, at (415) 749-5073.

A copy of the engineering evaluation report containing the basis for this decision is attached. If you have any questions, please contact Ryan Atterbury, Senior Air Quality Engineer (ratterbury@baaqmd.gov).

Regards,

Dr. Philip Fine
Executive Officer/Air Pollution Control Officer

Enclosures
Cc (via electronic mail only):

Bill Crotinger
Manager, Argent Materials
bill@argentmaterials.com

Matt Chasm
Safety & Compliance Officer
matt@argentmaterials.com

Omonigho Oiyemhonlan
Assistant Counsel II, Bay Area Air Quality Management District
OOiyemhonlan@baaqmd.gov

Engineering Evaluation
Argent Materials, Inc. Expansion Project
(Applications 29851 and 30122)
Plant No. 22474

SECTION 1: INTRODUCTION

Argent Materials, Inc., ("Argent") has applied for permits to expand the operational capacity and physical footprint of its existing concrete and asphalt recycling business ("Facility") located in East Oakland. Argent seeks authorization to: 1) double the amount of raw material that it currently stockpiles and processes at the Facility from 500,000 to 1,000,000 tons per year; 2) increase the amount of finished material the Facility currently stockpiles and sells from 500,000 to 1,600,000 tons per year; and 3) expand the Facility's physical location to include a new storage and overflow yard that is adjacent to the its materials processing yard and used to stockpile and sell finished material from its processing yard as well as smaller quantities of imported materials (collectively, "expansion project").

Argent's request for permits to expand its existing Facility has arisen in a somewhat unique manner. Rather than submitting one comprehensive permit application outlining all the proposed modifications to expand its existing Facility, Argent split its expansion project in two and submitted permit applications for each piece. And rather than waiting for the Air District to make a decision on the permit applications with the proposed modifications, Argent went ahead and expanded into the storage and overflow yard where it has been stockpiling and selling finished aggregate material for the last six years without a permit.

The Air District has reviewed Argent's expansion project for compliance with the Air District's permitting requirements. Based on this evaluation, the Air District should deny Argent's permit applications for the expansion project on two independent grounds. First, Argent piecemealed its expansion project for permitting purposes in violation of Regulation 1-104, which prohibits permit applicants from dividing a project into separate permit applications to evade or circumvent Air District rules or regulations. Per Regulation 2-1-304, the Air District shall deny any permit application that does not comply with applicable regulatory requirements, including Regulation 1-104. Second, the Air District conducted a Health Risk Assessment (HRA) to determine whether the project's toxic emissions comply with the toxic health risk limits prescribed in Regulation 2-5. The results of the HRA show the expansion project has a chronic Hazard Index value of 1.2, which indicates that long-term exposure to the project's toxic emissions has the potential to cause adverse health effects. Per Regulation 2-5-302, the Air District is prohibited from approving permit applications for a project with a chronic Hazard Index value that exceeds 1. For these reasons, I recommend that the Air District deny Permit Applications Nos. 29851 and 30122 because Argent's expansion project does not comply with applicable permitting regulations.

SECTION 2: BACKGROUND

Argent operates a concrete and asphalt recycling Facility located on 85th Avenue in East Oakland, California. The Facility receives broken concrete and asphalt ("raw aggregate") from construction and demolition projects in the Bay Area and grinds these materials to produce recycled rock and sand products ("finished aggregate") that are stored on-site and made available for sale, distribution, and/or pickup by customers.

As shown in Figure 1 below, the Facility consists of two adjacent yards (only one of which is currently permitted) on 85th Avenue that are diagonally across from each other and separated by railroad right of way. The permitted Main Yard, on the west side, is where Argent crushes and grinds the raw aggregate to produce finished aggregate that it stockpiles on-site until they are sold and distributed.[1] The Facility's Main Yard has eight sources of air pollutant emissions that are identified in Argent's Permit to Operate as Sources S-1 through S-8.[2] These sources are:

- The Raw Aggregate Stockpile (S-1), where Argent stockpiles raw aggregate in an outdoor area totaling 30,000 square feet. Dust (particulate matter) emissions from the Raw Aggregate Stockpile are abated using a water spray system to keep the stockpiles saturated. The water spray system, which is identified in Argent's Permit to Operate as abatement system A-1, consists of sprinklers, sprayers, misters, a fire hose, and a water truck with a drop tank.
- The Finished Aggregate Stockpile (S-2), where finished aggregate products (Class II Base Rock and Drain Rock) [3] are separately stockpiled for sale and distribution. The Finished Aggregate Stockpile is also abated by a water spray system, abatement system A-2.
- Primary and secondary crushers (S-3 and S-4), which Argent uses to break large concrete and asphalt debris into softball-sized aggregate.
- Two screeners (S-5 and S-6), which separate the crushed aggregate by size.
- A conveyor system (S-7) that transports crushed raw aggregate into the Facility's industrial building for additional processing and sorting.
- Paved on-site Haul Roads (S-8) that are used to move raw and finished aggregate around the Facility using trucks.[4] Dust emissions generated by truck traffic on the Facility's

[1] The street address for the Main Yard is 8300 Baldwin Street, Oakland, CA 94621.
[2] Argent Permit to Operate (exp. July 1, 2025).
[3] Class II Base Rock is a mixture of crushed rock ranging from ¾" to fine dust and meets the specifications in Section 26 of the State of California Standard Specifications. Drain rock is typically ¾" and often used in French drains and leaching fields.
[4] Currently, the Haul Roads (S-8) are not separately listed in Argent's Permit to Operate. Instead, they are included in the aggregate stockpile sources, S-1 and S-2.

Haul Roads (S-8) are also abated using a water spray system.

Three of the Main Yard's sources, the Raw Aggregate Stockpile (S-1), the Finished Aggregate Stockpile (S-2), and the Haul Roads (S-8), are subject to the permit requirements in Air District Regulation 2. The other five sources—the crushers (S-3 and S-4), the screeners (S-5 and S-6), and the conveyor system (S-7)—are exempt from permitting because the moisture content of the aggregate handled by each source is above the threshold that would subject them to the Air District's permitting requirements.[5] These sources are also exempt because they sources are electrically powered and will not generate significant emissions.

Figure 1: Argent Materials, Inc., Concrete and Asphalt Recycling Operation[6]

The Fulfillment Yard, on the east side, is where Argent stockpiles and sells finished aggregate from the Main Yard and smaller quantities of imported materials.[7] In 2022, Argent reported processing nearly 150,000 tons of finished aggregate at the Fulfillment Yard. Argent has been operating aggregate stockpiles at the Fulfillment Yard without a required permit since 2019. In July 2023, the Air District issued a Notice of Violation (No. A61930) to Argent for installing and

[5] Regulations 2-1-115.1.3; 2-1-115.1.4.
[6] Argent Materials, Inc., https://argentmaterials.com/pages/locations.
[7] The street address for the Fulfillment Yard is 8501 San Leandro Street, Oakland, CA 94621.

operating aggregate stockpiles in violation of Air District Regulation 2-1-301 and 2-1-302.

SECTION 3: PROJECT DESCRIPTION AND PERMIT APPLICATION HISTORY

A. Argent's Expansion Plan and Permit Applications

Argent began operating the Facility in late 2013 without a required permit from the Air District in violation of Air District Regulations 2-1-301 and 2-1-302. At that time, the Facility consisted of only the Main Yard. Argent eventually obtained a Permit to Operate in December 2017 with authorization to crush and store up to 500,000 tons per year of raw and finished aggregate at the Main Yard. Since then, Argent has renewed its Permit to Operate for the eight sources (S-1 through S-8) at the Main Yard.[8]

In 2019, Argent applied for permits to increase the total operational capacity and physical footprint of its existing Facility (i.e., the Main Yard). Argent's expansion project proposes to double the amount of raw aggregate that it currently stockpiles and processes at the Facility from 500,000 to 1,000,000 tons per year, increase the amount of finished aggregate the Facility currently stockpiles and sells from 500,000 to 1,600,000 tons per year, and expand the Facility's physical location to include a new storage and overflow yard to stockpile and sell finished aggregate from the Main Yard as well as smaller quantities of imported materials. Argent's expansion project is subject to the permit requirements in Air District Regulation 2.

But rather than submit one comprehensive permit application for all the proposed modifications to the existing Facility and its operation, Argent split its expansion project into separate elements for purposes of applying for an Air District permit.

- **Application 29851:** On April 5, 2019, Argent submitted Application 29851 to modify the processing capacity at the Facility's Main Yard. Currently, the Main Yard is permitted to crush and stockpile no more than 500,000 tons per year of raw and finished aggregate and use 20,000 Vehicle Miles Traveled ("VMT") per year on the Haul Roads. Application 29851 seeks to increase the permitted limits in Argent's current Permit to Operate for the Raw Aggregate Stockpile (S-1), the Finished Aggregate Stockpile (S-2), and the Haul Roads (S-8) to double the processing capacity from 500,000 to 1,000,000 tons per year and the VMTs from 20,000 to 40,000.
- **Application 30122:** Five months later, on September 9, 2019, Argent submitted Application 30122 to include a new storage and overflow yard—the Fulfillment Yard—to

[8] Between 2020 and 2024, due to a clerical oversight, the Permit to Operate erroneously specified an aggregate processing limit of 1,000,000 tons per year for the Raw Aggregate Stockpile (S-1) and Finished Aggregate Stockpile (S-2) each, instead of the actual, permitted limit of 500,000 tons per year for each pile. The Air District notified Argent of this oversight on September 19, 2023, and issued a corrected document reflecting the actual permit limits of 500,000 tons per year for these sources. Argent's current Permit to Operate shows the correct limits.

stockpile and sell finished material from the Main Yard as well as smaller quantities of imported materials. Argent sought an Authority to Construct and Permit to Operate to stockpile no more than 600,000 tons per year of finished aggregate and use up to 12,658 VMTs per year of haul road truck traffic at the Fulfillment Yard.[9]

However, as explained above, Argent did not wait to obtain a permit before expanding into the Fulfillment Yard, which it has been operating from for the last six years.

B. Air District Review of Argent's Permit Applications for the Expansion Project.

Although Argent split its expansion project into two separate permit applications, the Air District has reviewed the applications together as one project to prevent piecemealing and circumvention of applicable regulatory requirements. A comprehensive review of Argent's entire project is required by Air District regulations to avoid the possibility that a single project is divided into separate permit applications to evade full regulatory review.

1. Air District Regulations Do Not Allow Argent to Split the Facility into Two Separate Yards for Permitting Purposes.

Argent has contended during the permit review process that the Facility's Main Yard and Fulfillment Yard should be treated as separate "facilities" for permitting purposes. But the two yards are both integral parts of Argent's core business of recycling and selling aggregate material, and its operation—which spans both yards—falls squarely within the definition of "facility" in Regulation 2-1-213.[10]

Regulation 2-1-213 defines "facility" as any "installation that emits or may emit any air pollutant." Argent's operation satisfies this definition because it is a single, unified installation that emits air pollutants—not multiple, separate installations. Argent holds itself out as one business, with a single website and business presence covering all operations at both yards.[11] Argent's website has a banner at the top of each page "Centrally located site, long business hours, reliable inventory," and its website provides a map of the Facility—as shown in Figure 1 above—depicting the Main Yard and Fulfillment Yard as part of a single, common operation. Argent has one management team that runs the entire operation across both yards, and it does not make any distinction between the two yards as being separate businesses.[12] As such, the entire operation, including both Yards, are a single "installation" emitting air pollutants for purposes of

[9] Argent's permit application for the Fulfillment Yard requests to stockpile finished aggregate, but subsequent communications with Argent and inspections at the Fulfillment Yard indicate that Argent is also storing raw aggregate at the Fulfillment Yard.
[10] See Regulation 2-1-213. This "facility" definition applies to all permitting rules in Regulation 2, including the toxic risk requirements in Regulation 2-5. See Regulation 2-1-102 (provisions of Rule 2-1, including definitions, apply to all Rules in Regulation 2).
[11] Argent Materials, Inc., https://argentmaterials.com/.
[12] Argent Materials, Inc., https://argentmaterials.com/pages/meet-the-team.

Air District Regulation 2-1-213.

Even if the two yards were considered to be separate installations, they would still constitute a single "facility" under Regulation 2-1-213, which provides that a "facility" also includes any aggregation of sources, buildings, structures or installations that are: (i) located on one or more contiguous or adjacent properties; (ii) under common ownership or control; and (iii) in the same major industrial grouping, as identified by the first two digits of the applicable SIC code.[13] The two yards satisfy all three elements of this definition. They are adjacent, located kitty-corner and across the railroad tracks with their entrances only roughly 100 yards away from each other;[14] they are both owned and operated by Argent Materials, Inc., a California general stock corporation; and they both share a common SIC designation—code 5211 (Lumber and Other Building Materials Dealers).

Argent has stated that the Main Yard should be classified under SIC codes 1422 (Crushed and Broken Limestone), 1423 (Crushed and Broken Granite), and 1429 (Crushed and Broken Stone, Not Elsewhere Classified), not code 5211. But these three codes only refer to businesses that are engaged in mining or quarrying crushed rocks, cement, granite, and other materials. SIC code 5211 applies to businesses that are "engaged in selling cement, sand, gravel, and other building materials" to construction contractors and the public.[15] Since the Main Yard has also always functioned as a point of sale and distribution of finished aggregate, code 5211 applies to both yards.

Furthermore, even if the two yards did nominally have different SIC designations, they would still share the same major industrial grouping under Regulation 2-1-213.1 and would be treated as a single facility because the Fulfillment Yard qualifies as a "support facility" for the Main Yard. A support facility "conveys, stores, or otherwise significantly assists the production of the principal product of another facility"[16] and is "considered to be in the same major industrial grouping as the facility it supports, regardless of what code may nominally apply"[17] and "part of the principal facility that it supports."[18] Argent describes the Fulfillment Yard as "a

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[13] An SIC code is a four-digit numerical code that is used to describe and categorize companies by industry and their primary line of work. The first two numbers of an SIC code represent a company's major sector (11 sectors to choose from), the third number identifies the company's business classification, and the fourth number specifies the company's business category.
[14] Adjacent simply means "nearby" or "not distant." Merriam-Webster. (n.d.). Adjacent. In Merriam-Webster.com dictionary. Retrieved from https://www.merriam-webster.com/dictionary/ajacent. It does not require the two yards to be physically touching or share a common boundary.
[15] Occupational Safety and Health Administration [U.S. Department of Labor], SIC Manual, https://www.osha.gov/sic-manual/5211.
[16] Regulation 2-1-242.
[17] Regulation 2-1-213.1.
[18] Regulation 2-1-242.

storage/overflow yard of finished product" from the Facility's Main Yard,"[19] and approximately 88% of the material handled at the Fulfillment Yard comes directly from the Main Yard.[20] For all these reasons, the two yards are in the same SIC major industrial grouping for purposes of Regulation 2-1-213 and comprise one facility.

2. Air District Regulations Do Not Allow Argent to Split its Expansion Project into Separate Applications for Permitting Purposes.

Multiple Air District regulations require all the new and modified emissions sources that Argent has implemented and plans to implement as part of its expansion project to be evaluated together.

First, Regulation 1-104 prohibits piecemealing a project to circumvent permitting requirements by breaking it up into individual elements. Preventing piecemealing in this manner is critical to ensure that all emissions sources included in the project are evaluated comprehensively for compliance with Air District regulations, and that there will be no significant air quality impacts and health risks from the project as a whole, including all its parts. These goals cannot be achieved without a full and complete picture of the project in its entirety.

A comprehensive review of all aspects of Argent's expansion project is especially important here because the Facility is located in East Oakland, a historically overburdened and disadvantaged community that is disproportionately exposed to air pollution and other environmental hazards from multiple commercial, industrial and other sources (e.g., the I-880 and I-580 freeways, Oakland International Airport, Port of Oakland, etc.). [21] According to CalEnviroScreen 4.0, a mapping and screening tool developed by the California Environmental Protection Agency that ranks census tracts throughout the state based on potential exposure pollution and demographic vulnerability to the adverse effects of pollution, East Oakland ranks worse than 90 percent of the rest of the state for combined pollution exposure and vulnerability.[22] Data shows East Oakland residents—who predominantly identify as non-white (98%) and whose incomes are two times below the federal poverty level (76%)—have lower life expectancies relative to nearby neighborhood and counties, lower birth rates, increased prevalence of asthma, and higher mortality rates from respiratory and cardiovascular diseases than most of California due to their constant exposure to air pollution.[23] Given the existing disproportionate air pollution burdens that this community is already experiencing, it is critical to ensure that all emissions sources are

[19] Permit Application 30122 at p. 2.
[20] Email from Matt Chasm (Argent Safety and Compliance Officer) to Air District on Sept. 15, 2023 Regarding Permit Application 30122.
[21] Regulation 2-1-243 (defining overburdened).
[22] Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0, https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/.
[23] Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0, Census Tract Nos. 6001409000, 6001406100, 6001407300, 6001408800, 6001409500, 6001409400, 6001409100, 6001409200, 6001409300.

accounted for to adequately address cumulative impacts from multiple pollution sources and to ensure that public health is protected to the full extent intended by Air District regulations.

Second, and more specifically, Regulation 2-5, the Air District's New Source Review permitting rule for Toxic Air Contaminants (TACs), requires that the Air District consider all TAC emissions sources within the entire project to ensure that toxic health risk limits are not exceeded.[24] Regulation 2-5-216 defines "project" to include all sources that are part of a proposed construction or modification, and it explicitly provides that all sources permitted within a five-year period are part of the same "project," unless the applicant can show that a later source was not a reasonably foreseeable consequence or a critical or integral element of the previous project. The Regulation requires all such sources to be included "in order to discourage circumvention that might be achieved by breaking a project into smaller pieces and submitting more than one permit application…."[25] These provisions ensure that the cumulative effects of all related elements of a project will be fully analyzed together in an HRA, which is crucial for projects that are proposed in overburdened communities like East Oakland where the localized impacts of TAC emissions are already more severe.[26]

Per Regulation 2-5, all elements of Argent's expansion project must be evaluated in an HRA. The new and modified sources proposed in Argent's expansion project at both yards are all part of the same modification to increase the Facility's operating capacity and physical footprint; therefore, these sources are all part of the same "project" as defined in Regulation 2-5-216.[27] And even if it were appropriate to evaluate Argent's expansion project under separate permit applications, these applications were submitted five months apart in 2019, so they would still be treated as the same "project" for purposes of the HRA.[28]

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[24] See Regulation 2-5-302, which requires the Air District to deny a permit application for a new or modified source of TAC emissions if the "project risk" exceeds specified limits. Regulation 2-5-217 defines "project risk" to include to total "health risk resulting from the emissions of toxic air contaminants from a given project."

[25] Regulation 2-5-216.

[26] Bay Area Air Quality Management District, Final Staff Report: Proposed Amendments to Regulation 2, Rule 1 (Permits – General Requirements) and Proposed Amendments to Regulation 2, Rule 5 (Permits – New Source Review of Toxic Air Contaminants) (December 2021) at pp. 31-32, https://www.baaqmd.gov/~/media/dotgov/files/rules/reg-2-permits/2021-amendments/documents/20211209_17_fsr_rg0201andrg0205-pdf.pdf?rev=7f5c188222e6434cbd24a3c4ffd9b1ac&sc_lang=en#%5B%7B%22num%22%3A124%2C%22gen%22%3A0%7D%2C%7B%22name%22%3A%22XYZ%22%7D%2C70%2C165%2C0%5D.

[27] Regulation 2-1-216 ("project" includes all sources that emit TACs and require a permit that are "part of a proposed construction or modification").

[28] Regulation 2-1-216 ("[A] project shall include those new or modified sources of TACs at a facility that have been permitted within the five-year period immediately preceding the date a

Additionally, Argent's permit application for the Fulfillment Yard was a reasonably foreseeable consequence of its initial request to double the Facility's processing limit for raw aggregate from 500,000 to 1,000,000 tons per year. According to Argent, the Main Yard "has limited area" to stockpile finished aggregate so a "storage/overflow yard" is needed.[29] Given the space limitations at the Main Yard, Argent would not be able to double the Facility's operating capacity without the support of the Fulfillment Yard, making it both critical and integral to the expansion of the Facility.

Since the permit applications for the Main Yard and Fulfillment Yard go hand in hand as parts of a single expansion project, Air District regulations require all the TAC emissions sources in the permit applications for both yards to be evaluated together in an HRA to ensure the expansion project's total cumulative impacts on air pollution exposure and public health are fully analyzed.

SECTION 4: EMISSION CALCULATIONS

This section summarizes the maximum daily and annual emissions for the emissions sources in Applications 29851 and 30122. Detailed emission calculations are provided in Appendix A-1 (criteria air pollutant emissions) and A-2 (TAC emissions).

A. Criteria Pollutant Emissions

A "criteria" pollutant is an air pollutant for which health-based standards have been established for ambient air quality. The criteria pollutant of concern for Applications 29851 and 30122 is particulate matter, which is one of the most significant air pollution issues facing the San Francisco Bay Area.[30] Short- and long-term exposure to particulate matter can cause an array of health issues such as: respiratory irritation, decreased lung function, asthma, bronchitis, and chronic obstructive pulmonary disease, increased emergency room visits, and premature death for people with heart or lung disease.[31] Particulate matter adversely impacts the environment as well. Studies have shown that particulate matter reduces visibility in the form of haze and

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complete application is received, and any projects at that facility where an Authority to Construct has been issued and has not expired, unless the applicant demonstrates to the satisfaction of the APCO that construction or modification of the sources included in the current application was neither (1) a reasonably foreseeable consequence of the previous project, nor (2) a critical element or integral part of the previous project.").

[29] See Permit Application 30122; Email from Matt Chasm (Argent Safety and Compliance Officer) to Air District on October 3, 2019 Regarding Materials Stockpile for Permit Application 30122; Email from Matt Chasm (Argent Safety and Compliance Officer) to Air District on June 19, 2023 Regarding Permit Application 30122.

[30] The sources for Applications 29851 and 30122 do not emit any other criteria pollutant.

[31] See U.S. Environmental Protection Agency, Integrated Science Assessment (ISA) for Particulate Matter (December 2019), https://cfpub.epa.gov/ncea/isa/recordisplay.cfm?deid=347534; U.S. Environmental Protection Agency, Supplement to the 2019 Integrated Science Assessment for Particulate Matter (May 2022), https://assessments.epa.gov/risk/document/&deid=354490.

accelerates the corrosion of metals, concrete, and other materials.[32] The Bay Area is currently designated as a nonattainment area for being in violation of the federal government's short-term air quality standard for fine particulate matter and the state's short and long-term standards for both fine and coarse particulate matter.

Table 1 provides the maximum annual and daily particulate matter emissions for the non-exempt sources (materials piles and haul roads) addressed in Applications 29851 and 30122, based on the facility's operating schedule (six days per week for 52 weeks). The table shows particulate matter emission rates for the three principal size classifications used for regulatory purposes: particles that are 2.5 microns or less in diameter ($PM_{2.5}$), 10 microns or less (PM_{10}), and 30 microns or less (PM_{30}). Stockpile emissions were calculated using the emission factors from AP 42 (Chapter 13.2.4, Aggregate Handling and Storage Piles) and include emissions from drop operations into stockpiles, emissions from equipment traffic traveling between piles, and emissions from wind erosion.[33] Haul road emissions were calculated using AP-42 (Chapter 13.2.1). Based on a facility-wide permit condition to use water spray abatement on the paved roads, the emissions formula includes an abatement variable that reduces the calculated particulate matter emissions at the paved haul roads by 70%.[34] See Appendix A-1 for more details.

[32] See U.S. Environmental Protection Agency, Integrated Science Assessment (ISA) for Particulate Matter (December 2019), https://cfpub.epa.gov/ncea/isa/recordisplay.cfm?deid=347534; U.S. Environmental Protection Agency, Supplement to the 2019 Integrated Science Assessment for Particulate Matter (May 2022), https://assessments.epa.gov/risk/document/&deid=354490.
[33] U.S. Environmental Protection Agency, AP-42: Compilation of Air Emissions Factors from Stationary Sources, https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-stationary-sources.
[34] Bay Area Air District, Permit Handbook at p. 244, https://www.baaqmd.gov/~/media/files/engineering/permit-handbook/baaqmd-permit-handbook.pdf?rev=fd6da37a0862483f899488a1f2b7f2fb.

Table 1. Materials Pile and Haul Road Particulate Matter Emissions

		Annual (lb/yr)	Daily (lb/day)	Annual (tpy)
Main Yard Raw Aggregate Stockpile	PM_{10}	179.4	0.52	0.090
	$PM_{2.5}$	7.7	0.02	0.004
Main Yard Finished Aggregate Stockpile	PM_{10}	426.7	1.33	0.213
	$PM_{2.5}$	51.7	0.17	0.026
Fulfillment Yard Finished Aggregate Stockpile	PM_{30}	1040.6	3.02	0.520
	PM_{10}	500.9	1.45	0.250
	$PM_{2.5}$	25.4	0.08	0.013
Main Yard Haul Roads	PM_{10}	7,412	20.31	3.706
	$PM_{2.5}$	1,819	4.98	0.910
Fulfillment Yard Haul Roads	PM_{30}	3,702.8	10.14	1.851
	PM_{10}	740.6	2.03	0.370
	$PM_{2.5}$	181.8	0.50	0.091

B. Toxic Air Contaminant (TAC) Emissions

Pursuant to Regulation 2-5, all emissions of TAC from new and modified sources are subject to an HRA if the emissions of any individual TAC exceed either the acute or chronic emission thresholds defined in Regulation 2-5, Table 2-5-1.

For this project, the metal TAC emissions were estimated as a fraction of maximum hourly and annual PM_{30} emissions because toxic emissions from these sources are due to the composition of the particles making up the particulate emissions. TAC emissions (except crystalline silica) were calculated as a percentage of PM_{30} emissions rather than PM_{10} because particulate emissions up to 30 microns can be ingested by alternate pathways to respiration and can thus affect health.[35] Respirable crystalline silica were calculated as a percentage of PM_{10} because it is defined as particles that are PM_4 or less (i.e., 4 microns or less in diameter).

The weight fraction of TAC in PM_{30} was estimated using the following equation and emissions factors (EF) of TACs and PM_{30} for concrete batching from AP-42 (Chapter 11.12). Since all TAC speciation profiles and emission factors are available only for cement, the weight fraction of TAC in PM_{30} emissions from concrete handling were estimated by normalizing for cement content in concrete. The cement content in concrete was also obtained from AP-42, Chapter 11.12.

[35] California Air Resources Board, Emission Inventory Criteria and Guidelines for the Air Toxics "Hot Spots" Program (March 21, 2022), https://ww2.arb.ca.gov/rulemaking/2020/hotspots2020.

$$\%\ \text{Wt of TAC in PM30 Emissions} = \frac{\text{TAC EF } (\text{lb}\frac{\text{TAC}}{\text{ton cement}})}{\text{PM30 EF } (\frac{\text{lb PM30}}{\text{ton cement}})} \times 100 \times \text{Cement content in Concrete } (\%)$$

AP-42 (Chapter 11.12) also provides emission factors for total chromium, but not hexavalent chromium. The fraction of hexavalent chromium in total chromium—20%—was estimated using data from a study published by the San Diego Air Pollution Control District study that is also referenced in the Air District's Permit Handbook.[36]

The weight fraction of crystalline silica in PM_{10} was derived using the methodology described in a 2007 source test report published by Air Control Techniques, P.C. and the concentration of crystalline silica in concrete from the same paper.[37]

The weight fraction of mercury in PM_{30} was estimated using a similar methodology. Mercury content in Portland cement was normalized for cement content in concrete, and the weight fraction of mercury in PM_{30} generated from concrete was assumed to be equal to the fraction of mercury in concrete.[38]

As shown in the Tables 2 and 3, under the expansion project, emissions from the paved roads at the Main Yard (S-8) exceed the acute emissions threshold for arsenic and the chronic emissions thresholds for hexavalent chromium and crystalline silica. Emissions from the paved roads at the Fulfillment Yard exceed the acute emissions threshold for arsenic. Based on these results, an HRA is required for this project.[39] The results of the HRA are discussed below in Section 5.

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[36] San Diego Air Pollution Control District, Concrete Batch Plant Operations (Nov. 30, 1998), https://www.sdapcd.org/content/dam/sdapcd/documents/permits/emissions-calculation/mineral-products-industry-concrete-batch-plant/APCD-concrete.pdf; Bay Area Air Quality Management District, Permit Handbook at p. 271, footnote 19, https://www.baaqmd.gov/~/media/files/engineering/permit-handbook/baaqmd-permit-handbook.pdf?rev=fd6da37a0862483f899488a1f2b7f2fb.

[37] PM4 CS & PM10 PM Emission Factors for Aggregate Producing Sources (July 31, 2007), https://www2.co.fresno.ca.us/4510/4360/environmental/KingsRiverSandGravel/Appendix_D-2007CRRNOS_Study.pdf; Richards, John R. et al., PM4 Crystalline Silica Emission Factors and Ambient Concentrations at Aggregate-Producing Sources in California (2009), Journal of the Air & Waste Management Association, 59:11, 1287-1295, https://doi.org/10.3155/1047-3289.59.11.1287.

[38] Johansen, V., & Hawkins, G.J. [Portland Cement Association], Mercury Emission and Speciation from Portland Cement Kilns (2003) at p. 8, https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=8eb3ab083010964772fbf9e186f580f0096f1427.

[39] TAC emissions from the aggregate stockpiles at the Main Yard (S-1 and S-2) and the finished stockpile at the Fulfillment Yard do not exceed their respective threshold for acute or chronic emissions. See Appendix A-2 Tables 8-10.

Table 2. S-8 TAC Emissions (Main Yard Haul Roads

TAC	Weight % in PM30	Maximum Hourly Emissions	Maximum Annual Permitted Emissions	BAAQMD Reg 2-5 Trigger Levels		HRA Triggered
		lb/hr	lb/yr	Acute (lb/hr)	Chronic (lb/yr)	Yes/No
Antimony (Sb)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Arsenic (As)	**1.53E-04**	**1.55E-05**	**5.67E-02**	**8.80E-05**	**1.60E-03**	**Yes**
Beryllium	3.06E-06	3.11E-07	1.13E-03	---	3.40E-02	No
Cadmium (Cd)	4.29E-07	4.35E-08	1.59E-04	---	1.90E-02	No
Hex Chromium (Cr+6)*	**1.29E-05**	**1.31E-06**	**4.77E-03**	**---**	**5.10E-04**	**Yes**
Cobalt (Co)	0.00E+00	0.00E+00	0.00E+00	---	1.10E-02	No
Copper (Cu)	0.00E+00	0.00E+00	0.00E+00	4.40E-02	---	No
Crystalline Silica	**4.58E+00**	**9.30E-02**	**3.40E+02**	**---**	**1.20E+02**	**Yes**
Elemental Carbon (EC)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Lead (Pb)	4.54E-05	4.61E-06	1.68E-02	---	2.90E-01	No
Manganese (Mn)	7.67E-04	7.79E-05	2.84E-01	---	3.50E+00	No
Mercury (Hg)	1.96E-07	1.99E-08	7.27E-05	2.70E-04	2.10E-01	No
Nickel (Ni)	1.49E-04	1.51E-05	5.53E-02	8.80E-05	3.10E-01	No
Phosphorus (P)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Selenium (Se)	3.28E-05	3.33E-06	1.22E-02	---	8.00E+00	No
Vanadium (V)	0.00E+00	0.00E+00	0.00E+00	1.30E-02	---	No

Table 3. TAC Emissions (Fulfillment Yard Haul Roads)

TAC	Weight % in PM30	Maximum Hourly Emissions	Maximum Annual Permitted Emissions	BAAQMD Reg 2-5 Trigger Levels		HRA Triggered
		lb/hr	lb/yr	Acute (lb/hr)	Chronic (lb/yr)	Yes/No
Antimony (Sb)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Arsenic (As)	**1.53E-04**	**1.55E-06**	**5.66E-03**	**8.80E-05**	**1.60E-03**	**Yes**
Beryllium	3.06E-06	3.10E-08	1.13E-04	---	3.40E-02	No
Cadmium (Cd)	4.29E-07	4.35E-09	1.59E-05	---	1.90E-02	No
Hex Chromium (Cr+6)*	1.29E-05	1.30E-07	4.76E-04	---	5.10E-04	No
Cobalt (Co)	0.00E+00	0.00E+00	0.00E+00	---	1.10E-02	No
Copper (Cu)	0.00E+00	0.00E+00	0.00E+00	4.40E-02	---	No
Crystalline Silica	4.58E+00	9.30E-03	3.39E+01	---	1.20E+02	No
Elemental Carbon (EC)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Lead (Pb)	4.54E-05	4.60E-07	1.68E-03	---	2.90E-01	No
Manganese (Mn)	7.67E-04	7.78E-06	2.84E-02	---	3.50E+00	No
Mercury (Hg)	1.96E-07	1.99E-09	7.27E-06	2.70E-04	2.10E-01	No
Nickel (Ni)	1.49E-04	1.51E-06	5.52E-03	8.80E-05	3.10E-01	No
Phosphorus (P)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Selenium (Se)	3.28E-05	3.33E-07	1.22E-03	---	8.00E+00	No
Vanadium (V)	0.00E+00	0.00E+00	0.00E+00	1.30E-02	---	No

SECTION 5: ANALYSIS OF ARGENT'S PERMIT APPLICATIONS FOR THE EXPANSION PROJECT

The Air District has evaluated Argent's expansion project and the associated toxic air emissions for compliance with applicable Air District regulations. Based on this evaluation, the Air District has determined that Argent's expansion project does not satisfy Air District regulations for two reasons.

A. Splitting the Expansion Project into Multiple Permit Applications is an Impermissible Circumvention of Air District Permitting Regulations.

Regulation 2-1-304 requires the Air District to deny permit applications that do not comply with any Air District, state, or federal regulation. Here, Argent split its expansion project and submitted two separate permit applications. This approach downplayed the scope of Argent's expansion project, which in turn delayed a comprehensive evaluation of all the new and modified sources at both yards that form the same project to expand the Facility, and it could have obscured the HRA results for the expansion project had the permit applications not been evaluated together. Splitting the expansion project into separate elements for purposes of applying for an Air District permit does not comply with Regulation 1-104, which prohibits piecemealing of permit applications to evade or circumvent Air District rules or regulations. Since these permit applications do not comply with Regulation 1-104, they must be denied.

B. The Expansion Project's Toxic Air Emissions Would Cause Unacceptable Chronic Health Risk Impacts.

Additionally, and independently, the permit applications must also be denied because the chronic health risk associated with Argent's expansion project exceeds the project risk limits specified in Regulation 2-5-302. The Air District conducted an HRA and found that the chronic health risk Hazard Index for the project was 1.2, which exceeds the permissible limit of 1.0 set forth in Regulation 2-5-302.2.

An HRA is a scientific tool that estimates the potential increase in health risks to people living, working or attending school at or near a facility that emits TACs.[40] HRAs evaluate three types of health risks: cancer-causing health impacts (cancer risk); noncancer health impacts due to long-term exposure to TAC emissions (chronic Hazard Index); and noncancer health impacts due to short-term exposure to TAC emissions (acute Hazard Index).

Cancer risk estimates the probability that an individual exposed to cancer-causing emissions will develop cancer during their lifetime.[41] Cancer risk is expressed in terms of the statistical likelihood that additional cancer cases will develop in a population of one million people exposed to a given level of carcinogenic TACs over their entire lifetime. A cancer risk of ten in one million means that if a population of one million people were exposed to carcinogenic TACs, there would likely be ten additional cancer cases within that population.

The Air District is prohibited from permitting a project where the cancer risk exceeds ten additional cancers per one million exposed population. If the cancer risk associated with the project is less than 10 in a million, but is greater than 1 in million, the project can be permitted, but the permit applicant must use the Toxics Best Available Control Technology (TBACT) to

[40] Regulation 11-18-211.
[41] Regulation 11-18-205. The cancer risk threshold is lower—6 in one million—for new or modified sources of TAC emissions in overburdened communities.

reduce the health risk from the project's TAC emissions.[42]

For noncancer health risk, the acute and chronic risk is expressed in terms of the Hazard Index ("HI"). The HI is a health-based guidance value that is designed to protect sensitive populations against the noncancer health effects from short and long-term exposure to TAC emissions. The HI determines the level of TAC exposure at or below which adverse noncancer health effects are not expected to occur. An HI value of 1 (HI = 1) suggests there will be no observable impacts on human health from TAC exposure. An HI value below 1 (HI < 1) indicates that TAC exposure is considered safe and is not expected to cause any health problems. An HI value above 1 (HI > 1) indicates that adverse health impacts may start to be observed. A project that has an HI value that exceeds 1 cannot be permitted.[43] If the HI is less than 1 but more than 0.2, the project can be permitted, but the applicant must use TBACT to reduce the health risk from the project's TAC emissions.[44]

Under Regulation 2-5, TAC emissions from new and modified sources are subject to an HRA when the emission of any individual TAC exceeds either the acute or chronic emission thresholds set in Regulation 2-5, Table 2-5-1. The Air District conducted an HRA to evaluate the health risk associated with the expansion project's crystalline silica, arsenic, and hexavalent chromium emissions, the three TACs for which emissions exceeded the thresholds in Table 2-5-1 as shown in Tables 2 and 3 above.

Respirable crystalline silica are very fine dust particles (less than 5 microns in size) that are created when cutting, sawing, grinding, and crushing material like sand, asphalt, concrete, gravel, stone, etc.[45] Prolonged exposure to this TAC can cause a multitude of serious respiratory diseases: silicosis (an incurable lung disease that can lead to permanent lung scarring known as pulmonary fibrosis), lung cancer, chronic bronchitis, emphysema, small airways disease, chronic obstructive pulmonary disease, and kidney disease.

Hexavalent chromium and arsenic are heavy metal TACs commonly associated with industrial processes. Hexavalent chromium is the most toxic form of metal chromium found in rocks. People are typically exposed to hexavalent chromium by breathing it in, ingestion, or direct contact with skin. Hexavalent chromium is regarded as a "known human carcinogen," which means there is sufficient evidence to indicate a causal relationship between exposure to this

[42] Regulation 2-5-301.
[43] Regulation 2-5-302 ("The APCO shall deny any Authority to Construct or Permit to Operate for any new or modified source of TACs if the project risk exceeds any of the following project risk limits: a cancer risk of 10 in one million; a chronic hazard index of 1.0; or an acute hazard index of 1.0."
[44] Regulation 2-5-301.
[45] Occupational Safety and Health Administration, Silica, Crystalline, https://www.osha.gov/silica-crystalline.

substance and the development of cancer.[46] Hexavalent chromium can cause lung cancer and cancer of the nose and nasal sinuses.[47]

Inorganic arsenic—arsenic combined with other elements like oxygen, chlorine, and sulfur—is also naturally occurring in rocks and minerals. And like hexavalent chromium, arsenic has been classified as a known carcinogenic. Breathing inorganic arsenic can cause "respiratory effects (cough, dyspnea, chest pain), gastrointestinal effects (nausea, diarrhea, abdominal pain), and central and peripheral nervous system effects."[48]

A few of the key inputs that informed the HRA's modeling are summarized below:

- The Facility will process the maximum aggregate throughput requested for the Main Yard (1,000,000 tons per year) and Fulfillment Yard (600,000 tons per year)
- The particulate matter emissions are PM_{30} instead of PM_{10} or $PM_{2.5}$, which are smaller in diameter and more easily inhaled) because the risk assessment does not calculate respiratory impacts of toxic emissions, but rather health impacts on the respiratory system.
- The Total PM_{30} emission factor from AP-42 (Chapter 11.2) is used to normalize the metals emission factors from lb/ton cement to %wt of PM emissions from concrete.
- The calculation of the weight percentage of TACs in PM_{30} uses the TSP (PM_{30}) emission factor for PM emissions from cement, used before the normalization of cement content in concrete.
- The crystalline silica emission factor assumes the aggregate crushed by Argent is 27.5% crystalline silica.[49]
- A conservative deposition rate of 0.05 m/s (instead of 0.02 m/s) is used for the Facility's paved haul roads because Argent's water spray abatement on the haul roads does not

[46] U.S. Department of Health and Human Services, Report on Carcinogens (2021) at p. 6, https://ntp.niehs.nih.gov/sites/default/files/ntp/roc/content/introduction_508.pdf.
[47] California Office of Environmental Health Hazard Assessment, Chromium (Hexavalent Compounds), https://www.p65warnings.ca.gov/fact-sheets/chromium-hexavalent-compounds-chromium-6-chromium-vi; National Cancer Institute, Hexavalent Chromium Compounds, https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/chromium.
[48] U.S. Environmental Protection Agency, Arsenic Compounds at p.1, https://www.epa.gov/sites/default/files/2021-04/documents/arsenic_april_2021.pdf.
[49] PM4 CS & PM10 PM Emission Factors for Aggregate Producing Sources (July 31, 2007), https://www2.co.fresno.ca.us/4510/4360/environmental/KingsRiverSandGravel/Appendix_D-2007CRRNOS_Study.pdf; Richards, John R. et al., PM4 Crystalline Silica Emission Factors and Ambient Concentrations at Aggregate-Producing Sources in California (2009), Journal of the Air & Waste Management Association, 59:11, 1287-1295, https://doi.org/10.3155/1047-3289.59.11.1287.

count as a control.[50]

The HRA calculates the health risks for Argent's expansion project as follows: Cancer Risk is **3.2 in a million**; Chronic HI is **1.2**; and Acute HI is **0.026**.

Table 4. Expansion Project Toxic Health Risk Impacts

Receptor	Cancer Risk (per one million)	Chronic Hazard Index	Acute Hazard Index
Resident	0.43	0.027	N/A
Worker	3.2	**1.2**	N/A
Point of Maximum Impact	N/A	N/A	0.026

The arsenic and crystalline silica emissions from the Haul Roads at the Main Yard (S-8) contribute nearly 98% of the expansion project's chronic HI value (1.2) for the Facility. Since the project's chronic HI exceeds a value of 1, which indicates that long-term exposure to the expansion project's toxic emissions has the potential to cause adverse health effects, it does not comply with the Air District's project risk requirements in Regulation 2-5-302.

This conclusion applies independently of whether the permit applications are impermissibly piecemealed in violation of Regulation 1-104. As discussed in Section 3.B.2., the risk limits in Regulation 2-5-302 apply to all sources that make up a given project, even if those sources are legitimately included in separate permit applications. The new and modified sources Argent proposed in Permit Applications 29851 and 30122, which were submitted within a short time of each other in 2019, are all part of the same project to expand the Facility; therefore, the applications must be evaluated together as a single project, regardless of whether they are presented in one common permit application or in separate applications.

[50] Bay Area Air Quality Management District, HRA Modeling Protocol (December 2020), https://www.baaqmd.gov/~/media/files/ab617-community-health/facility-risk-reduction/documents/baaqmd_hra_modeling_protocol-pdf.pdf?la=en.

RECOMMENDATION

The expansion project Argent proposed in Permit Applications 29851 and 30122 does not comply with the Air District's project risk requirements in Regulation 2-5-302 and the anti-circumvention requirements in Regulation 1-104; therefore, the Air District must deny the permit applications.

By: _____ Date: _____

Ryan Atterbury
Air Quality Engineer

Appendix A-1

Criteria Pollutant Emission Calculations

Main Yard

Emissions from S-1 Concrete and Asphalt Stockpile abated by A-1 Water Spray

Emission factors for storage piles were taken from Chapter 13.2.4, Aggregate Handling and Storage Piles, of AP-42. These emission factors include emissions from drop operations into storage piles, for emissions from equipment traffic traveling between piles, and for emissions for wind erosion.

The following equation estimates emission from drop operations into S-1:

$$E = k(0.0032)(U/5)^{1.3}/(M/2)^{1.4}$$

Where: E = Emission factor, (lb/ton)
k = particulate size multiplier (dimensionless); PM10, k = 0.35; PM2.5, k=0.053
U = mean wind speed (miles/hr); U= 8.2
M = material moisture content (%); M= 28.7

$$E_{PM10} = (0.35)(0.0032)(8.2/5)^{1.3}/(28.7/2)^{1.4}$$
$$E_{PM10} = 5.12E\text{-}05 \text{ lb/ton}$$

PM10 (lb/yr) = (5.12E-05 lb/ton)(1,000,000 tons/yr)
PM10 (lb/yr) = 51.2
PM10 (lb/day) = 0.16

According to AP-42, Fourth Edition, Section 8.19, Table 8.19.1-1, the following equation estimates PM10 emissions from wind erosion for S-1:

PM10 (lb/day) = (1.7 lb/acre/day)(0.689 acres)
PM10 (lb/day) = 1.17
PM10 (lb/yr) = 427.52

Assume 70% control for water spray:
PM10 (lb/yr) = 427.52(1-0.7) **= 128.26 lb/yr**
PM10 (lb/day) = 0.35

The stockpile area of S-1 would not increase with the increased throughput. Argent would have increased the throughput without increasing the stockpile area by reducing the period of time that material was kept onsite before being sold or by transferring the material to the Fulfillment Yard.

PM2.5 emissions from drop operations into S-1:

$$E_{PM2.5} = (0.053)(0.0032)(8.2/5)^{1.3}/(28.7/2)^{1.4}$$
$$E_{PM2.5} = 7.75E\text{-}06 \text{ lb/ton}$$

PM2.5 (lb/yr) = (7.75E-06 lb/ton)(1,000,000 tons/yr)
PM2.5 (lb/yr) = 7.7

PM2.5 (lb/day) = 0.02

There is no emission factor from wind erosion for PM2.5 in AP-42.

Table 1. S-1 Annual and Daily Emissions (Main Yard)

S-1 Total Emissions	Yearly (lb/yr)	Daily (lb/day)	Annual (tpy)
PM10	179.4	0.52	0.090
PM2.5	7.7	0.02	0.004

Emissions from S-2 Finished Product Pile abated by A-2 Water Spray

The following equation estimates emissions from drop operations into S-2:

$$E_{PM10} = k(0.0032)(U/5)^{1.3}/(M/2)^{1.4}$$

$$E_{PM10} = (0.35)(0.0032)(8.2/5)^{1.3}/(7.4/2)^{1.4}$$
$$E_{PM10} = 3.4E\text{-}04 \text{ lb/ton}$$

PM10 (lb/yr) = (3.4E-04 lb/ton)(1,000,000 tons/yr)
PM10 (lb/yr) = 341.2
PM10 (lb/day) = 1.09

The following equation estimates PM10 emissions from wind erosion for S-2:

PM10 (lb/day) = (1.7 lb/acre/day)(0.459 acres)
PM10 (lb/day) = 0.78
PM10 (lb/yr) = 284.8

Assume 70% control for water spray

PM10 (lb/yr) = 284.8(1-0.7) **= 85.4 lb/yr**
PM10 (lb/day) = 0.23

The stockpile area of S-2 would not increase with the increased throughput. Argent would have increased the throughput without increasing the stockpile area by reducing the period of time that material was kept onsite before being sold or by transferring the material to the Fulfillment Yard site.

PM2.5 emissions from drop operations into S-2:

$$E_{PM2.5} = (0.053)(0.0032)(8.2/5)^{1.3}/(7.4/2)^{1.4}$$
$$E_{PM2.5} = 5.17E\text{-}05 \text{ lb/ton}$$

PM2.5 (lb/yr) = (5.17E-05 lb/ton)(1,000,000 tons/yr)
PM2.5 (lb/yr) = 51.7
PM2.5 (lb/day) = 0.17

Table 2. S-2 Annual and Daily Emissions (Main Yard)

S-2 Total Emissions	Yearly (lb/yr)	Daily (lb/day)	Annual (tpy)
PM10	426.7	1.33	0.213
PM2.5	51.7	0.17	0.026

Fugitive Dust from Paved Roads – S-8, Hauler Roads

Fugitive emission estimates from paved roads were performed using AP-42 Chapter 13.2.1. A facility-wide permit condition to use water spray abatement on the paved roads would have been imposed and would have reduced calculated particulate emissions by 70%, per Permit Handbook Chapter 11.7. (Note that the facility is likely currently using water spray on the surface to comply with BAAQMD Regulation 6, Rule 1, Particulate Matter.) The quantity of particulate emissions from resuspension of loose material on the road surface due to vehicle travel on dry paved roads is estimated using the following empirical expression:

$$E = k(sL)^{0.91} \times W^{1.02} \times (1\text{-}A)$$

where: E = Emission factor, pounds per vehicle miles traveled (lbs/VMT)

k = particulate size multiplier (lbs/VMT) = 0.0022, for $PM_{10;}$ 0.00054 for $PM_{2.5}$ from Table 13.2.1-1

sL = road surface silt loading (g/m2) = 12, max value for concrete batching from Table 13.2.1-3

W = average weight of vehicles (tons) = 19.475, estimate provided by applicant

A = abatement factor, 70% from Permit Handbook Chapter 11.7

$$E_{PM10} = [0.0022\ (12)^{0.91}] \times [19.475^{1.02}] \times [1\text{-}0.70] = 0.131 \text{ lbs/VMT}$$

The applicant estimated that the maximum gross weight of loaded trucks is 50,000 lbs, and that the unloaded weight is 24,000 lbs. In addition, it was estimated that up to 15% of trucks come in loaded, dump, pick up material, and leave loaded. The other 85% of trucks are assumed to come to the site either loaded, dump, and leave empty or come unloaded, pick up material, and leave loaded. Therefore, the average vehicle weight was:

W = (0.15)*(50,000 lbs/2,000 lbs/ton) + (0.85)*((24,000 lbs + 50,000 lbs)/(2*2,000 lbs/ton)) = 19.475 tons

To estimate the vehicle miles traveled resulting from the throughput at sources 1 and 2, the application has estimated that each truck will be able to move 15 tons per trip. At 1,000,000 tpy at S1, trucks moving materials at S1 will take 66,667 trips/yr. The applicant has estimated that each truck trip will take 0.56 miles, so there will be 37,333 vehicle miles traveled (VMT/yr) due to S1.

While S2 would also have a throughput of 1,000,000 tpy, 15% (150,000 tpy) is already counted in the VMT for S1, as 15% of the trucks will visit S2 after S1. Another 144,000 tpy throughput will be subtracted, as it will be used for concrete production, the VMT of which will be accounted for in the road dust emissions associated with the cement and cement supplement silos being permitted in Permit Application No. 704634. Therefore, the effective throughput for S2 will be 706,000 tpy and there will be 47,067 vehicle trips. The applicant has estimated that each truck trip will take 0.41 VMT, so there will be 19,297 VMT/yr due to S2.

Therefore, PM10 emissions from the paved roads at the site are:

PM10: (0.131 lbs/VMT) x (37,333 + 19,297 VMT/yr) = 7,412 lb/yr, 3.706 TPY

PM2.5 emissions:

$$E_{PM2.5} = [0.00054\ (12)^{0.91}] \times [19.475^{1.02}] \times [1\text{-}0.70] = 0.032 \text{ lbs/VMT}$$

PM2.5 emissions from the paved roads at the site are:

PM2.5: (0.032 lbs/VMT) x (37,333 + 19,297 VMT/yr) = 1,819 lb/yr, 0.910 TPY

Table 3. Annual and Daily Emissions (Main Yard)

S-8 Total Emissions	Yearly (lb/yr)	Daily (lb/day)	Annual (tpy)
PM10	7,412	20.31	3.706
PM2.5	1,819	4.98	0.910

Previously, fugitive emissions from paved roads at this site were not calculated.

Fugitive Dust from Unpaved Roads

The roads at the site have been fully paved since application 26341 was evaluated. Therefore, there are no emissions due to unpaved roads.

Fulfillment Yard

Emissions from Proposed Finished Product Stockpile abated by A-1 Water Spray

The following equation estimates emissions from drop operations into S-1:

$$E = k(0.0032)(U/5)^{1.3}/(M/2)^{1.4}$$

where: E = Emission factor, (lb/ton)
k = particulate size multiplier (dimensionless); PM30, k = 0.74; PM10, k = 0.35; PM2.5, k=0.053
U = mean wind speed (miles/hr); U= 8.2
M = material moisture content (%); M= 8.53

PM30 emissions from drop operations into S-1 (used to calculate TACs):

$$E_{PM30} = (0.74)(0.0032)(8.2/5)^{1.3}/(8.53/2)^{1.4}$$
$$E_{PM30} = 5.91E\text{-}04 \text{ lb/ton}$$

PM30 (lb/yr) = (5.91E-04 lb/ton)(600,000 tons/yr)
PM30 (lb/yr) = 354.6
PM30 (lb/day) = 1.14

According to AP-42, Fourth Edition, Section 8.19, Table 8.19.1-1, the following equation estimates PM30 emissions from wind erosion for S-1:

PM30 (lb/day) = (3.5 lb/acre/day)(1.79 acres)
PM30 (lb/day) = 6.27
PM30 (lb/yr) = 2286.7

Assume 70% control for water spray:
PM30 (lb/yr) = 2286.7(1-0.7) **= 686.0 lb/yr**
PM30 (lb/day) = 1.88

PM10 emissions from drop operations into S-1:

$$E_{PM10} = (0.35)(0.0032)(8.2/5)^{1.3}/(8.53/2)^{1.4}$$
$$E_{PM10} = 2.80E\text{-}04 \text{ lb/ton}$$

PM10 (lb/yr) = (2.80E-04 lb/ton)(600,000 tons/yr)
PM10 (lb/yr) = 167.7
PM10 (lb/day) = 0.54

According to AP-42, Fourth Edition, Section 8.19, Table 8.19.1-1, the following equation estimates PM10 emissions from wind erosion for S-1:

PM10 (lb/day) = (1.7 lb/acre/day)(1.79acres)
PM10 (lb/day) = 3.04
PM10 (lb/yr) = 1110.7

Assume 70% control for water spray:
PM10 (lb/yr) = 1110.7(1-0.7) **= 333.2 lb/yr**
PM10 (lb/day) = 0.91

PM2.5 emissions from drop operations into Proposed Finished Product Stockpile:

$E_{PM2.5} = (0.053)(0.0032)(8.2/5)^{1.3}/(8.53/2)^{1.4}$
$E_{PM2.5}$ = 4.23E-05 lb/ton

PM2.5 (lb/yr) = (4.23E-05 lb/ton)(600,000 tons/yr)
PM2.5 (lb/yr) = 25.4
PM2.5 (lb/day) = 0.08

There is no emission factor from wind erosion for PM2.5 in AP-42.

Table 4. Proposed Stockpile Annual and Daily Emissions (Fulfillment Yard)

Total Emissions for Proposed Stockpile	Yearly (lb/yr)	Daily (lb/day)	Annual (tpy)
PM30	1040.6	3.02	0.520
PM10	500.9	1.45	0.250
PM2.5	25.4	0.08	0.013

Fugitive Dust from Proposed Paved Haul Roads at Fulfillment Yard

$$E = k(sL)^{0.91} \times W^{1.02} \times (1-A)$$

where: E = Emission factor, pounds per vehicle miles traveled (lbs/VMT)

k = particulate size multiplier (lbs/VMT) = 0.011 for PM_{30}; 0.0022 for $PM_{10;}$ 0.00054 for $PM_{2.5}$ from Table 13.2.1-1

sL = road surface silt loading (g/m2) = 12, max value for concrete batching from Table 13.2.1-3

W = average weight of vehicles (tons) = 16.07, estimate provided by applicant

A = abatement factor, 70% from Permit Handbook Chapter 11.7

$$E_{PM30} = [0.011\ (12)^{0.91}] \times [16.07^{1.02}] \times [1\text{-}0.70] = 0.538 \text{ lbs/VMT}$$

The applicant estimated that vehicles come in empty and travel on 67% of the haul path. The fully loaded truck then leaves and travels on 33% of the trip path. For 80% of trips, the trucks are loaded with 15 tons of materials, and for 20% of the trips, the trucks are loaded with 1 ton of materials. The unloaded trucks weigh 12 tons. Therefore, the average vehicle weight is:

$$W = (0.20)*(0.67*12 \text{ tons} + 0.33*(12 \text{ tons} + 1 \text{ ton})) + (0.80)*(0.67*12 \text{ tons} + 0.33*(12 \text{ tons} + 15 \text{ tons})) = 16.07 \text{ tons}$$

The roads at the site are fully paved. To estimate the vehicle miles traveled resulting from the throughput at source 1, the application has estimated that 20% of trips are done by pick up trucks that each carry 1 ton of aggregate, and the other 80% of trips are done by trucks that each carry 15 tons of aggregate. At 600,000 tpy at S1, vehicles moving materials will take 49,181 trips/yr. The applicant has estimated that each truck trip will take 0.14 miles, so there will be 6,885 vehicle miles traveled (VMT/yr) due to S1. PM30 emissions have been included because they are used to calculate TAC emissions. Therefore, PM30 emissions from the paved roads at the site are:

PM30: (0.538 lbs/VMT) x (6,885 VMT/yr) = 3,703 lb/yr, 1.851 TPY

PM10 emissions:

$$E_{PM10} = [0.00054\ (12)^{0.91}] \times [16.07^{1.02}] \times [1\text{-}0.70] = 0.108 \text{ lbs/VMT}$$

PM10 emissions from the paved roads at the site are:

PM10: (0.108 lbs/VMT) x (6,885 VMT/yr) = 741 lb/yr, 0.370 TPY

PM2.5 emissions:

$$E_{PM2.5} = [0.00054\ (12)^{0.91}] \times [16.07^{1.02}] \times [1\text{-}0.70] = 0.026 \text{ lbs/VMT}$$

PM2.5 emissions from the paved roads at the site are:

PM2.5: (0.026 lbs/VMT) x (6,885 VMT/yr) = 182 lb/yr, 0.091 TPY

Table 5. Proposed Haul Roads Annual and Daily Emissions (Fulfillment Yard)

Total Emissions for Proposed Haul Roads	Yearly (lb/yr)	Daily (lb/day)	Annual (tpy)
PM30	3,702.8	10.14	1.851
PM10	740.6	2.03	0.370
PM2.5	181.8	0.50	0.091

Previously, fugitive emissions from paved roads at this site were not calculated.

Fugitive Dust from Unpaved Roads

All roads at the site are paved. Therefore, there are no emissions due to unpaved roads.

Appendix A-2
TAC Emissions Calculations

Metal TAC emissions in Tables 6-10 were estimated as a fraction of maximum hourly and annual PM30 emissions because toxic emissions from this source type are due to the composition of the particles making up the particulate emissions. All the materials processed at the Main Yard (concrete and asphalt) and 97% of the material processed at Fulfillment Yard (as reported by Argent in September 2023: 19% concrete products; 69% Class II Base Rock; 5% virgin materials; and 4% asphaltic materials) are sufficiently close in composition to concrete to be assumed as such, and represent the worst case toxic emissions. For this reason, the particulate emissions were assumed to be composed of concrete, which is composed of several materials including cement and aggregate, which both contain TACs. TAC emissions were calculated as a percentage of PM30 emissions rather than PM10 emissions (except for crystalline silica) due to an update of California Air Resources Board's Emission Inventory and Criteria Guidelines for the Air Toxics Hot Spots Act, reasoning that particulate emissions up to 30 microns can be ingested by alternate pathways to respiration and can thus affect health.[51] Respirable crystalline silica has been calculated as a percentage of PM_{10} because it is defined as particles that are PM4 or less.[52]

The weight fraction of TAC in PM30 was estimated using the emissions factors (EF) and equations for concrete batching published by the U.S. EPA in its compilation of air pollutant emissions Factors.[53]

$$\%\ \text{Wt of TAC in PM30 Emissions} = \frac{\text{TAC EF}\left(\text{lb}\frac{\text{TAC}}{\text{ton cement}}\right)}{\text{PM30 EF}\left(\frac{\text{lb PM30}}{\text{ton cement}}\right)} \times 100 \times \text{Cement content in Concrete}\ (\%)$$[54]

[51] California Air Resources Board, Air Toxics "Hot Spots" Emission Inventory Criteria and Guidelines (EICG) Regulation (approved on March 21, 2022), https://ww2.arb.ca.gov/rulemaking/2020/hotspots2020.

[52] Volume 59, November 2009, p. 1287-1295."PM_4 Crystalline Silica Emission Factors and Ambient Concentrations at Aggregate-Producing Sources in California". *Journal of the Air and Waste Management Association.*

[53] United States Environmental Protection Agency (U.S. EPA), AP-42, Compilation of Air Pollutant Emission Factors for Stationary Sources (5 ed., Vol. I), Chapter 11.12, https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors-stationary-sources.

[54] The cement content in concrete, and the overall recipe for concrete, was published in Ap-42 11.12. This equation was done by inspection and is self-evident. The 1/ton cement cancels in the fraction, leaving lb TAC/lb PM30 (wt%) in terms of cement, which is then normalized to concrete by multiplying by the cement content in concrete.

Because all TAC speciation profiles or emission factors are available only for cement, rather than concrete, which is the assumed composition of the particulate emissions, the weight fraction of TAC in PM30 emissions from concrete handling were estimated by normalizing for cement content in concrete. This allows the calculation of toxic emissions to be in terms of particulate emissions from concrete, which can be directly estimated.[55] The cement content in concrete was also obtained from AP-42, Chapter 11.12.

$$\%\ \text{Wt of TAC in PM30 Emissions} = \frac{\text{TAC EF}\left(\text{lb}\frac{\text{TAC}}{\text{ton cement}}\right)}{\text{PM30 EF}\left(\frac{\text{lb PM30}}{\text{ton cement}}\right)} \times 100 \times \text{Cement content in Concrete}\ (\%)$$

AP-42, Chapter 11.12 provides emission factors for total chromium, but not hexavalent chromium. The fraction of hexavalent chromium in total chromium was estimated using the data from a San Diego Air Pollution Control District study, which is also used in the revised BAAQMD Permit Handbook Chapter 11.5.[56] The fraction is 20%.

The fraction of crystalline silica in PM10 was derived using the methodology described in the 2007 source test report by the CA Construction and Industrial Materials Association, "PM4 CS & PM10 PM Emission Factors for Aggregate Producing Sources, 2005 & 2006 Test Programs" and the concentration of crystalline silica in concrete from material safety data sheets (MSDS) accessed online.

The fraction of mercury in PM30 was also estimated using a similar methodology. Mercury content in Portland cement[57] was normalized for cement content in concrete. The fraction of mercury in PM30 generated from concrete was assumed to be equal to the fraction of mercury in concrete.

[55] Concrete is composed of several elements (see AP-42, 11.12), including cement. Because the toxic elements come only from specific components within concrete, and the particulate is characterized as concrete, the Air District normalizes the toxic elements of concrete to concrete to get the wt% of TACs in the PM, which is concrete.
[56] Concrete Batch Plant Operations, http://www.sdapcd.org/toxics/emissions/concrete/concrete1.pdf
[57] [Mercury Emission and Speciation from Portland Cement Kilns, page 8 http://www.ibrarian.net/navon/paper/Research___Development_Information.pdf?paperid=12267008]

Table 6. S-8 TAC Emissions (Main Yard paved haul roads)[58]

TAC	Weight % in PM30	Maximum Hourly Emissions	Maximum Annual Permitted Emissions	BAAQMD Reg 2-5 Trigger Levels		HRA Triggered
		lb/hr	lb/yr	Acute (lb/hr)	Chronic (lb/yr)	Yes/No
Antimony (Sb)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Arsenic (As)	**1.53E-04**	**1.55E-05**	**5.67E-02**	**8.80E-05**	**1.60E-03**	**Yes**
Beryllium	3.06E-06	3.11E-07	1.13E-03	---	3.40E-02	No
Cadmium (Cd)	4.29E-07	4.35E-08	1.59E-04	---	1.90E-02	No
Hex Chromium (Cr+6)*	**1.29E-05**	**1.31E-06**	**4.77E-03**	**---**	**5.10E-04**	**Yes**
Cobalt (Co)	0.00E+00	0.00E+00	0.00E+00	---	1.10E-02	No
Copper (Cu)	0.00E+00	0.00E+00	0.00E+00	4.40E-02	---	No
Crystalline Silica	**4.58E+00**	**9.30E-02**	**3.40E+02**	**---**	**1.20E+02**	**Yes**
Elemental Carbon (EC)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Lead (Pb)	4.54E-05	4.61E-06	1.68E-02	---	2.90E-01	No
Manganese (Mn)	7.67E-04	7.79E-05	2.84E-01	---	3.50E+00	No
Mercury (Hg)	1.96E-07	1.99E-08	7.27E-05	2.70E-04	2.10E-01	No
Nickel (Ni)	1.49E-04	1.51E-05	5.53E-02	8.80E-05	3.10E-01	No
Phosphorus (P)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Selenium (Se)	3.28E-05	3.33E-06	1.22E-02	---	8.00E+00	No
Vanadium (V)	0.00E+00	0.00E+00	0.00E+00	1.30E-02	---	No

Table 7. TAC Emissions for Proposed Haul Roads (Fulfillment Yard)[59]

TAC	Weight % in PM30	Maximum Hourly Emissions	Maximum Annual Permitted Emissions	BAAQMD Reg 2-5 Trigger Levels		HRA Triggered
		lb/hr	lb/yr	Acute (lb/hr)	Chronic (lb/yr)	Yes/No
Antimony (Sb)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Arsenic (As)	**1.53E-04**	**1.55E-06**	**5.66E-03**	**8.80E-05**	**1.60E-03**	**Yes**
Beryllium	3.06E-06	3.10E-08	1.13E-04	---	3.40E-02	No
Cadmium (Cd)	4.29E-07	4.35E-09	1.59E-05	---	1.90E-02	No
Hex Chromium (Cr+6)*	1.29E-05	1.30E-07	4.76E-04	---	5.10E-04	No
Cobalt (Co)	0.00E+00	0.00E+00	0.00E+00	---	1.10E-02	No
Copper (Cu)	0.00E+00	0.00E+00	0.00E+00	4.40E-02	---	No
Crystalline Silica	4.58E+00	9.30E-03	3.39E+01	---	1.20E+02	No
Elemental Carbon (EC)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Lead (Pb)	4.54E-05	4.60E-07	1.68E-03	---	2.90E-01	No
Manganese (Mn)	7.67E-04	7.78E-06	2.84E-02	---	3.50E+00	No
Mercury (Hg)	1.96E-07	1.99E-09	7.27E-06	2.70E-04	2.10E-01	No
Nickel (Ni)	1.49E-04	1.51E-06	5.52E-03	8.80E-05	3.10E-01	No
Phosphorus (P)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Selenium (Se)	3.28E-05	3.33E-07	1.22E-03	---	8.00E+00	No
Vanadium (V)	0.00E+00	0.00E+00	0.00E+00	1.30E-02	---	No

[58] This table is cross-referenced as Table 2 in Section 4.B of the Evaluation Report.
[59] This table is cross-referenced as Table 3 in Section 4.B of the Evaluation Report.

Table 8. S-1 TAC Emissions (Main Yard raw aggregate stockpile)

TAC	Weight % in PM30	Maximum Hourly Emissions	Maximum Annual Permitted Emissions	BAAQMD Reg 2-5 Trigger Levels		HRA Triggered
		lb/hr	lb/yr	Acute (lb/hr)	Chronic (lb/yr)	Yes/No
Antimony (Sb)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Arsenic (As)	1.53E-04	1.64E-07	5.69E-04	8.80E-05	1.60E-03	No
Beryllium (metals)	3.06E-06	3.27E-09	1.14E-05	---	3.40E-02	No
Cadmium (Cd)	4.29E-07	4.59E-10	1.60E-06	---	1.90E-02	No
Hex Chromium (Cr+6)*	1.29E-05	1.38E-08	4.79E-05	---	5.10E-04	No
Cobalt (Co)	0.00E+00	0.00E+00	0.00E+00	---	1.10E-02	No
Copper (Cu)	0.00E+00	0.00E+00	0.00E+00	4.40E-02	---	No
Crystalline Silica	4.58E+00	2.36E-03	8.22E+00	---	1.20E+02	No
Elemental Carbon (EC)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Lead (Pb)	4.54E-05	4.86E-08	1.69E-04	---	2.90E-01	No
Manganese (Mn)	7.67E-04	8.21E-07	2.86E-03	---	3.50E+00	No
Mercury (Hg)	1.96E-07	2.10E-10	7.30E-07	2.70E-04	2.10E-01	No
Nickel (Ni)	1.49E-04	1.60E-07	5.55E-04	8.80E-05	3.10E-01	No
Phosphorus (P)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Selenium (Se)	3.28E-05	3.51E-08	1.22E-04	---	8.00E+00	No
Vanadium (V)	0.00E+00	0.00E+00	0.00E+00	1.30E-02	---	No

Table 9. S-2 TAC Emissions (Main Yard finished aggregate stockpile)

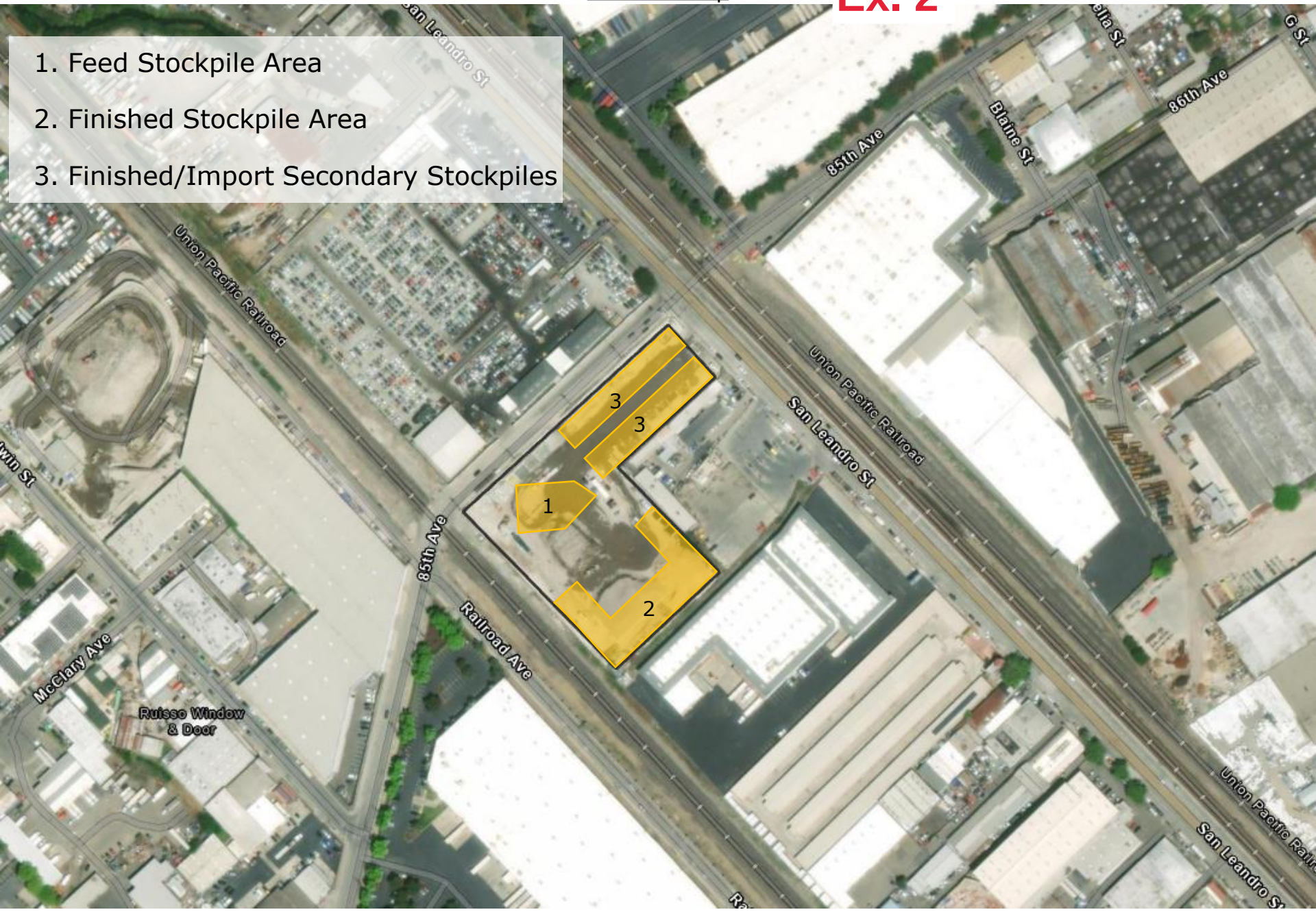
TAC	Weight % in PM30	Maximum Hourly Emissions	Maximum Annual Permitted Emissions	BAAQMD Reg 2-5 Trigger Levels		HRA Triggered
		lb/hr	lb/yr	Acute (lb/hr)	Chronic (lb/yr)	Yes/No
Antimony (Sb)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Arsenic (As)	1.53E-04	4.27E-07	1.37E-03	8.80E-05	1.60E-03	No
Beryllium	3.06E-06	8.55E-09	2.74E-05	---	3.40E-02	No
Cadmium (Cd)	4.29E-07	1.20E-09	3.85E-06	---	1.90E-02	No
Hex Chromium (Cr+6)*	1.29E-05	3.59E-08	1.15E-04	---	5.10E-04	No
Cobalt (Co)	0.00E+00	0.00E+00	0.00E+00	---	1.10E-02	No
Copper (Cu)	0.00E+00	0.00E+00	0.00E+00	4.40E-02	---	No
Crystalline Silica	4.58E+00	6.08E-03	1.95E+01	---	1.20E+02	No
Elemental Carbon (EC)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Lead (Pb)	4.54E-05	1.27E-07	4.07E-04	---	2.90E-01	No
Manganese (Mn)	7.67E-04	2.14E-06	6.88E-03	---	3.50E+00	No
Mercury (Hg)	1.96E-07	5.48E-10	1.76E-06	2.70E-04	2.10E-01	No
Nickel (Ni)	1.49E-04	4.17E-07	1.34E-03	8.80E-05	3.10E-01	No
Phosphorus (P)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Selenium (Se)	3.28E-05	9.18E-08	2.95E-04	---	8.00E+00	No
Vanadium (V)	0.00E+00	0.00E+00	0.00E+00	1.30E-02	---	No

Table 10. TAC Emissions for Finished Aggregate Stockpile (Fulfillment Yard)

TAC	Weight % in PM30	Maximum Hourly Emissions	Maximum Annual Permitted Emissions	BAAQMD Reg 2-5 Trigger Levels		HRA Triggered
		lb/hr	lb/yr	Acute (lb/hr)	Chronic (lb/yr)	Yes/No
Antimony (Sb)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Arsenic (As)	1.53E-04	4.61E-07	1.59E-03	8.80E-05	1.60E-03	No
Beryllium	3.06E-06	9.23E-09	3.18E-05	---	3.40E-02	No
Cadmium (Cd)	4.29E-07	1.29E-09	4.46E-06	---	1.90E-02	No
Hex Chromium (Cr+6)*	1.29E-05	3.88E-08	1.34E-04	---	5.10E-04	No
Cobalt (Co)	0.00E+00	0.00E+00	0.00E+00	---	1.10E-02	No
Copper (Cu)	0.00E+00	0.00E+00	0.00E+00	4.40E-02	---	No
Crystalline Silica	4.58E+00	6.65E-03	2.30E+01	---	1.20E+02	No
Elemental Carbon (EC)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Lead (Pb)	4.54E-05	1.37E-07	4.72E-04	---	2.90E-01	No
Manganese (Mn)	7.67E-04	2.31E-06	7.98E-03	---	3.50E+00	No
Mercury (Hg)	1.96E-07	5.92E-10	2.04E-06	2.70E-04	2.10E-01	No
Nickel (Ni)	1.49E-04	4.50E-07	1.55E-03	8.80E-05	3.10E-01	No
Phosphorus (P)	0.00E+00	0.00E+00	0.00E+00	---	---	No
Selenium (Se)	3.28E-05	9.91E-08	3.42E-04	---	8.00E+00	No
Vanadium (V)	0.00E+00	0.00E+00	0.00E+00	1.30E-02	---	No

8501 Site Map

Ex. 2



Ex. 3

BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

June 5, 2019

Argent Materials Inc
8300 Baldwin Street
Oakland, CA 94621

Attention: **Matt Chasm**

Application Number :**29851**
Plant No. :**22474**
Equipment Location :
Argent Materials Inc
8300 Baldwin Street
Oakland, CA 94621

Dear Applicant:

Subject: Material Stockpiles

We are pleased to inform you that your application is now complete. Every effort will be made to expedite the processing of your permit application. A final decision will be made as soon as possible, but no later than 07/04/19. This completeness determination and final decision date may be revised if you submit new information indicating a significant change in the project design, use rate or other factors which will influence emissions.

Please include your application number with any correspondence with the District. If you have any questions on this matter, please call **Ryan Atterbury at (415) 749-4670**.

CC: RA

Ex. 4

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

PERMIT TO OPERATE

This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE

JUL 1, 2020

Plant# 22474

Bill Crotinger, Manager
Argent Materials Inc
2855 Mandela Pkwy
Oakland, CA 94608

ORIGINAL SENT TO:

Argent Materials Inc
8300 Baldwin Street
Oakland, CA 94621

Location: 8300 Baldwin Street
Oakland, CA 94621

S#	DESCRIPTION	[Schedule]	PAID
1	FUGITIVE EMISSIONS> Combined fugitive emission sources Stockpile, Concrete and ASphalt Raw Feed Pile Abated by: A1 Water Spray System	[F]	462
2	FUGITIVE EMISSIONS> Combined fugitive emission sources Stockpile, Finished Product Pile Abated by: A2 Water Spray System	[F]	462
3	MTGL/SEC> Crushing/shredding, Asphalt, 500 tons/hr max Jaw Crusher	[exempt]	0
4	MTGL/SEC> Crushing/shredding, Asphalt, 200 tons/hr max Cone Crusher	[exempt]	0
5	MTGL/SEC> Anodizing, Asphalt, 500 tons/hr max Materials Screen	[exempt]	0
6	MTGL/SEC> Crushing/shredding, Asphalt, 500 tons/hr max Materials Screen	[exempt]	0
7	MTGL/SEC> Crushing/shredding, Asphalt, 500 tons/hr max Materials Conveyor	[exempt]	0

The operating parameters described above are based on information supplied by permit holder and may differ from the limits set forth in the attached conditions of the Permit to Operate. The limits of operation in the permit conditions are not to be exceeded. Exceeding these limits is considered a violation of District regulations subject to enforcement action.

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

PERMIT TO OPERATE

This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE

JUL 1, 2020

Plant# 22474

S#	DESCRIPTION	[Schedule]	PAID

2 Permitted Sources, 5 Exempt Sources

*** See attached Permit Conditions ***

The operating parameters described above are based on information supplied by permit holder and may differ from the limits set forth in the attached conditions of the Permit to Operate. The limits of operation in the permit conditions are not to be exceeded. Exceeding these limits is considered a violation of District regulations subject to enforcement action.

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

PERMIT TO OPERATE

This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE

JUL 1, 2020

Plant# 22474

*** PERMIT CONDITIONS ***

==========

Source#	Subject to Condition Numbers
1	26498
2	26498

The operating parameters described above are based on information supplied by permit holder and may differ from the limits set forth in the attached conditions of the Permit to Operate. The limits of operation in the permit conditions are not to be exceeded. Exceeding these limits is considered a violation of District regulations subject to enforcement action.

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

PERMIT TO OPERATE

This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE

JUL 1, 2020

Plant# 22474

*** PERMIT CONDITIONS ***

==========

COND# 26498 *applies to S#'s 1, 2*

1. The owner/operator shall not exceed the following materials throughput limits in any consecutive 12-month period:

S-1 Concrete and Asphalt Raw Feed Pile: 1,000,000 tons/yr S-2 Finished Product, 2 Piles: 1,000,000 tons/yr (basis: Cumulative Increase)

2. The owner/operator shall abate the particulate matter (PM-10 and PM-2.5) emissions from S-1 using Water Spray System A-1. (Basis: Regulation 6-301, Cumulative Increase)

3. The owner/operator shall abate the particulate matter (PM-10 and PM-2.5) emissions from S-2 using Water Spray System A-2. (Basis: Regulation 6-301, Cumulative Increase)

4. The owner/operator shall maintain S-1 and S-2 in a completely "surface wet" condition or shall not result in visible particulate matter emissions which exceed Ringelmann 0.5. (Basis: Regulation 6-301, Cumulative Increase)

5. Effective July 1st, 2019, the owner/operator shall comply with the trackout standards of Regulation 6-6-301, 6-6-302, and the monitoring and recordkeeping requirements of Regulation 6-6-501. (Basis: Regulation 6-6-301, 6-6-302, 6-6-501)

6. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, the owner/operator shall conduct an initial performance test in accordance with EPA Test Method 9. The owner/operator of S-1 and S-2 shall submit the test report to the District within 30 days of the test. (Basis: NSPS Subpart OOO)

7. To determine compliance with the above parts, the owner/operator shall maintain the following records and provide all of the data necessary to evaluate compliance

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

PERMIT TO OPERATE

This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE

JUL 1, 2020

Plant# 22474

*** PERMIT CONDITIONS ***

==========

with the above parts, including the following information:

a. Total daily throughput of material.

b. The daily throughput of material shall be totaled on a monthly basis.

All records shall be kept on-site in a District approved log for at least 24 months from the date on which a record is made and be made available to the District staff on request. (Basis: Recordkeeping, Cumulative Increase)

~~~~~~~~~~~~~~~~~~~~~~~~~~~~ END OF CONDITIONS ~~~~~~~~~~~~~~~~~~~~~~~~~~~~
~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Ex. 5

September 19, 2023

Argent Materials Inc
8300 Baldwin Street
Oakland, CA 94621

Attention: Bill Crotinger, Manager

Plant Number: E2474
Equipment Location: Argent Materials
8300 Baldwin Street
Oakland, CA 94621

Dear Applicant:

SUBJECT: **NOTICE OF PERMIT CONDITION CHANGE**

The Permit to Operate for your facility has been updated. Permit condition 26498, Part 1 has been changed to reflect the correct consecutive 12 month throughput limit of 500,000 tons per year for S-1 and S-2, as applied to each source individually. This change was necessary to correct the Permit to Operate, which was erroneously updated to display a consecutive 12 month throughput limit of 1,000,000 tons per year, per source. This action restores the Permit to Operate to its original and accurate version.

Very truly yours
Pamela Leong
Director of Engineering

Attachment: Permit condition no. 26498

Permit Condition No. 26498

1. The owner/operator shall not exceed the following materials throughput limits in any consecutive 12 month period:
   . S-1 Concrete and Asphalt Raw Feed Pile: 500,000 tons/yr
   . S-2 Finished Product, 2 Piles: 500,000 tons/yr
   .(basis: Cumulative Increase)
2. The owner/operator shall abate the particulate matter (PM-10 and PM-2.5) emissions from S-1 using Water Spray System A-1. (Basis: Regulation 6-301, Cumulative Increase)
3. The owner/operator shall abate the particulate matter (PM-10 and PM-2.5) emissions from S-2 using Water Spray System A-2. (Basis: Regulation 6-301, Cumulative Increase)
4. The owner/operator shall maintain S-1 and S-2 in a completely "surface wet" condition or shall not result in visible particulate matter emissions which exceed Ringelmann 0.5. (Basis: Regulation 6-301, Cumulative Increase)
5. Effective July 1st, 2019, the owner/operator shall comply with the trackout standards of Regulation 6-6-301, 6-6-302, and the monitoring and recordkeeping requirements of Regulation 6-6-501. (Basis: Regulation 6-6-301, 6-6-302, 6-6-501)
6. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, the owner/operator shall conduct an initial performance test in accordance with EPA Test Method 9. The owner/operator of S-1 and S-2 shall submit the test report to the District within 30 days of the test. (Basis: NSPS Subpart OOO)
7. To determine compliance with the above parts, the owner/operator shall maintain the following records and provide all of the data necessary to evaluate compliance with the above parts, including the following information:
   a. Total daily throughput of material.
   b. The daily throughput of material shall be totaled on a monthly basis.

. All records shall be kept on site in a District approved log for at least 24 months from the date on which a record is made and be made available to the District staff on request. (Basis: Recordkeeping, Cumulative Increase)

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

PERMIT TO OPERATE

This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE
JUL 1, 2024

Plant# 22474

Argent Materials Inc
8300 Baldwin Street
Oakland, CA 94621

Location: 8300 Baldwin Street
Oakland, CA 94621

S#	DESCRIPTION	[Schedule]	PAID
1	MINERL> Storage, open, Multi-material Stockpile, Concrete and Asphalt Raw Feed Pile Abated by: A1 Water Spray System	[F]	650
2	MINERL> Storage, open, Multi-material Stockpile, Finished Product Pile Abated by: A2 Water Spray System	[F]	650
3	MINERL> Mining/quarry, crushing, Asphalt, 500 tons/hr max Jaw Crusher	[exempt]	0
4	MINERL> Mining/quarry, crushing, Asphalt, 200 tons/hr max Cone Crusher	[exempt]	0
5	MTGL/SEC> Anodizing, Asphalt, 500 tons/hr max Materials Screen	[exempt]	0
6	MINERL> Screening, Asphalt, 500 tons/hr max Materials Screen	[exempt]	0
7	MINERL> Conveying, Asphalt, 500 tons/hr max Materials Conveyor	[exempt]	0

2 Permitted Sources, 5 Exempt Sources

*** See attached Permit Conditions ***

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

PERMIT TO OPERATE

This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE
JUL 1, 2024

Plant# 22474

*** PERMIT CONDITIONS ***

Source#	Subject to Condition Numbers
1	26498
2	26498

The operating parameters described above are based on information supplied by permit holder and may differ from the limits set forth in the attached conditions of the Permit to Operate. The limits of operation in the permit conditions are not to be exceeded. Exceeding these limits is considered a violation of District regulations subject to enforcement action.

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

PERMIT TO OPERATE

This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE
JUL 1, 2024

Plant# 22474

*** PERMIT CONDITIONS ***

==========

COND# 26498 *applies to S#'s 1, 2*

1. _The owner/operator shall not exceed the following materials throughput limits in any consecutive 12 month period:
. S-1 Concrete and Asphalt Raw Feed Pile: 500,000 tons/yr
. S-2 Finished Product, 2 Piles: 500,000 tons/yr
.(basis: Cumulative Increase)
2. The owner/operator shall abate the particulate matter (PM-10 and PM-2.5) emissions from S-1 using Water Spray System A-1. (Basis: Regulation 6-301, Cumulative Increase)
3. The owner/operator shall abate the particulate matter (PM-10 and PM-2.5) emissions from S-2 using Water Spray System A-2. (Basis: Regulation 6-301, Cumulative Increase)
4. The owner/operator shall maintain S-1 and S-2 in a completely "surface wet" condition or shall not result in visible particulate matter emissions which exceed Ringelmann 0.5. (Basis: Regulation 6-301, Cumulative Increase)
5. Effective July 1st, 2019, the owner/operator shall comply with the trackout standards of Regulation 6-6-301, 6-6-302, and the monitoring and recordkeeping requirements of Regulation 6-6-501. (Basis: Regulation 6-6-301, 6-6-302, 6-6-501)
6. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, the owner/operator shall conduct an initial performance test in accordance with EPA Test Method 9. The owner/operator of S-1 and S-2 shall submit the test report to the District within 30 days of the test. (Basis: NSPS Subpart OOO)
7. To determine compliance with the above parts, the owner/operator shall maintain the following records and provide all of the data necessary to evaluate compliance with the above parts, including the following information:
   a. Total daily throughput of material.
   b. The daily throughput of material shall be totaled on a monthly basis.

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

PERMIT TO OPERATE

This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE
JUL 1, 2024

Plant# 22474

*** PERMIT CONDITIONS ***

==========

. All records shall be kept on site in a District approved log for at least 24 months from the date on which a record is made and be made available to the District staff on request. (Basis: Recordkeeping, Cumulative Increase)

~~~~~~~~~~~~~~~~~~~~~~~~~~~~ END OF CONDITIONS ~~~~~~~~~~~~~~~~~~~~~~~~~~~~
~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Bay Area Air Quality Management District

** SOURCE EMISSIONS **

PLANT #22474
Jun 16, 2023

S#	Source Description	Annual Average lbs/day PART	ORG	NOx	SO2	CO
1	Stockpile, Concrete and Asphalt Raw Feed P	4.36	-	-	-	-
2	Stockpile, Finished Product Pile	4.74	-	-	-	-
3	Jaw Crusher	-	-	-	-	-
4	Cone Crusher	-	-	-	-	-
5	Materials Screen	-	-	-	-	-
6	Materials Screen	-	-	-	-	-
7	Materials Conveyor	-	-	-	-	-
T O T A L S		9.1				

** PLANT TOTALS FOR EACH EMITTED TOXIC POLLUTANT **

Pollutant Name	Emissions lbs/day
Silica (crystalline, respirable)	1.34

Ex. 6

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
Engineering Division (415) 749-4990
www.baaqmd.gov fax (415) 749-5030

Form P-101B
Authority to Construct/
Permit to Operate

1. Application Information

BAAQMD Plant No. _____ Company Name Argent Materials INC

Equipment/Project Description _____

2. Plant Information *If you have not previously been assigned a Plant Number by the District or if you want to update any plant data that you have previously supplied to the District, please complete this section.*

Equipment Location 8501 San Leandro Street

City Oakland Zip Code 94621

Mail Address 8300 Baldwin street

City Oakland State CA Zip Code 94621

Plant Contact Matt Chasm Title Safety & Compliance Officer

Telephone (415) 686-6051 Fax (510) 638-7189 Email matt@argentmaterials.com

NAICS (North American Industry Classification System) see www.census.gov/eos/www/naics/ _____

3. Proximity to a School (K-12)

The sources in this permit application (*check one*) ☐ Are ☑ Are not within 1,000 ft of the outer boundary of the nearest school.

4. Application Contact Information *All correspondence from the District regarding this application will be sent to the plant contact unless you wish to designate a different contact for this application.*

Application Contact Matt Chasm Title Safety & Compliance Officer

Mail Address 8300 Baldwin stret

City Oakland State CA Zip Code 94621

Telephone (415) 686-6051 Fax (510) 638-7189 Email matt@argentmaterials.com

5. Additional Information *The following additional information is required for all permit applications and should be included with your submittal. Failure to provide this information may delay the review of your application. Please indicate that each item has been addressed by checking the box. Contact the Engineering Division if you need assistance.*

☐ If a new Plant, a local street map showing the location of your business

☐ A facility map, drawn roughly to scale, that locates the equipment and its emission points

☐ Completed data form(s) and a pollutant flow diagram for each piece of equipment.
(See www.baaqmd.gov/forms/permits)

☐ Project/equipment description, manufacturer's data

☐ Discussion and/or calculations of the emissions of air pollutants from the equipment

6. Trade Secrets *Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to a third party. If you wish to keep certain items separate as specified in Regulation 2, Rule 1, Section 2-1-402.7, please complete the following steps.*

☐ Each page containing trade secret information must be labeled "trade secret" with the trade secret information clearly marked.

☐ A second copy, with trade secret information blanked out, marked "public copy" must be provided.

☐ For each item asserted to be trade secret, you must provide a statement which provides the basis for your claim.

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Please Fax To: 415-749-4969

This Is Our Secured Fax Line
VISA & MASTERCARD ONLY

CREDIT CARD PAYMENT FORM
For Limited Use Only, Read Side Box

Credit Card Information Help Line: 415-749-4636

If you do not have an invoice number or amount, do not submit this form without prior approval from a permit engineer.

Amount: $ _____ **Invoice #** _____

Choose One:

Permit Application #	
Renewal Site #	
NOA Notification #:	
Public Records #:	

IMPORTANT! The following CANNOT be paid using this credit card form:

- **No Notice of Violation/Settlements**
- **No Renovations/Demolitions – No J#s**
- **No Open Burn Notifications**

Please refer to www.BAAQMD.GOV for how to pay these fees Online or call 415-771-6000. Do Not fax Finance Office Notification Forms.

We can no longer charge credit cards above $5000.00

Credit Card Billing Information:

Business Name: _____

Credit Card #: _____

Expiration Date: _____

Name on Card: _____

Billing Zip Code: _____

Contact Phone: _____

Authorized Signature (Required): _____

Signature indicates that you are approving the BAAQMD to charge to your credit card for the amount indicated above.

Credit cards faxed to 415-749-4969 are accessible only to designated Finance Staff. The date of the fax and/or postmark is considered the paid-by-date. If you require further information concerning how to make a credit card payment to the Air District, please call our informational line at: 415-749-4636. A resubmission of this form may be required if details such as the payment amount or an authorizing signature are missing. The amount written will be the amount charged, regardless if the amount due is different.

If you need information pertaining to how much the balance due is, please discuss with your designated Air District contact or call the following appropriate contact numbers: PERMITS: 415-749-4990; PUBLIC RECORDS: 415-749-4761; or NOA: 415-749-4795.
If a refund is determined, a credit will be issued back to the credit card used for the original payment. The Finance staff can be contacted via 415-749-4942, 415-749-4636, or rworld@baaqmd.gov.

(Optional) Email Receipt to: _____

There are no transaction or convenience fees assessed for using this form.
Credit Cards CANNOT Be Accepted Over the Phone, or via Email.

If you are a Gas Station/GDF, Auto Body, or Dry Cleaner, you may be able to pay for your application or renewal online, without transaction fees. Please email PermitHelp@BAAQMD.GOV to check eligibility.

375 Beale Street, Suite 600 • San Francisco California 94105
Help Line: 415-749-4636 / Fax: 415-749-4969 • http://www.baaqmd.gov

7. Small Business Certification *You are entitled to a reduced permit fee if you qualify as a small business as defined in Regulation 3. In order to qualify, you must certify that your business meets all of the following criteria:*

☐ The business does not employ more than 10 persons and its gross annual income does not exceed $750,000.

☐ And the business is not an affiliate of a non-small business. (Note: a non-small business employs more than 10 persons and/or its gross income exceeds $750,000.)

8. Green Business Certification *You are entitled to a reduced permit fee if you qualify as a green business as defined in Regulation 3. In order to qualify, you must certify that your business meets all of the following criteria:*

☐ The business has been certified under the Bay Area Green Business Program coordinated by the Association of Bay Area Governments and implemented by participating counties.

☐ A copy of the certification is included.

9. Accelerated Permitting *The Accelerated Permitting Program entitles you to install and operate qualifying sources of air pollution and abatement equipment* ***without waiting for the District to issue a Permit to Operate****. To participate in this program you must certify that your project will meet all of the following criteria. Please acknowledge each item by checking each box.*

☑ Uncontrolled emissions of any single pollutant are each less than 10 lb/highest day, or the equipment has been precertified by the BAAQMD.

☑ Emissions of toxic compounds do not exceed the trigger levels identified in Table 2-5-1 (see Regulation 2, Rule 5).

☑ The source is not a diesel engine.

☑ The project is not subject to public notice requirements (the source is either more than 1000 ft. from the nearest school, or the source does not emit any toxic compound in Table 2-5-1).

☑ For replacement of abatement equipment, the new equipment must have an equal or greater overall abatement efficiency for all pollutants than the equipment being replaced.

☑ For alterations of existing sources, for all pollutants the alteration does not result in an increase in emissions.

☐ Payment of applicable fees (the minimum permit fee to install and operate each source). See Regulation 3 or contact the Engineering Division for help in determining your fees.

10. CEQA *Please answer the following questions pertaining to CEQA (California Environmental Quality Act).*

A. Has another public agency prepared, required preparation of, or issued a notice regarding preparation of a California Environmental Quality Act (CEQA) document (initial study, negative declaration, environmental impact report, or other CEQA document) that analyzes impacts of this project or another project of which it is a part or to which it is related? ☐ YES ☑ NO If no, go to section 10B.

Describe the document or notice, preparer, and date of document or expected date of completion:

B. List and describe any other permits or agency approvals required for this project by city, regional, state or federal agencies:

C. List and describe all other prior or current projects for which either of the following statements is true: (1) the project that is the subject of this application could not be undertaken without the project listed below, (2) the project listed below could not be undertaken without the project that is the subject of this application:

11. Certification *I hereby certify that all information contained herein is true and correct. (Please sign and date this form)*

Name of person certifying (print) | Title of person certifying | Signature of person certifying | Date

Send all application materials to the **BAAQMD Engineering Division, 375 Beale Street, Suite 600, San Francisco, CA 94105.**

Argent Materials

8501 San Leandro Street

S1) Recycled concrete based products

S2) Sand

S3) Recycled base rock

A1) Block wall

A2) Sprinkler system

A3) Gorilla snot

A4) Water truck

Data Form A
ABATEMENT DEVICE

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

375 Beale Street, Suite 600. . . San Francisco, CA 94105. . . (415) 749-4990 . . . FAX (415) 749-5030

for office use only

Abatement Device: Equipment/process whose primary purpose is to reduce the quantity of pollutant(s) emitted to the atmosphere.

1. Business Name: Argent Materials INC Plant No: _____ (If unknown, leave blank)

2. Name or Description Block wall Abatement Device No: A- 1

3. Make, Model, and Rated Capacity _____

4. Abatement Device Code (See table*) 65 Date of Initial Operation _____

5. With regard to air pollutant flow into this abatement device, what sources(s) and/or abatement device(s) are **immediately** upstream?

   S- 1 **S-** 3 **S-** _____ **S-** _____ **S-** _____
   S- _____ **A-** _____ **A-** _____ **A-** _____ **A-** _____ **A-** _____

6. Typical gas stream temperature at inlet: _____ °F

If this form is being submitted as part of an application for an ***Authority to Construct***, completion of the following table is mandatory. If not, and the Abatement Device is *already in operation*, completion of the table is requested but not required.

	Pollutant	Weight Percent Reduction (at typical operation)	Basis Codes *(See Table**)*
7.	Particulate	60%	8
8.	Organics		0
9.	Nitrogen Oxides (as NO_2)		0
10.	Sulfur Dioxide		0
11.	Carbon Monoxide		0
12.	Other:		
13.	Other:		

14. ☐ Check box if this Abatement Device burns fuel; complete lines 1, 2 and 15-36 on Form C (using the Abatement Device No. above for the Source No.) and attach to this form.

15. With regard to air pollutant flow from this abatement device, what sources(s), abatement device(s) and/or emission point(s) are ***immediately*** downstream?

   S- _____ **A-** _____ **A-** _____ **A-** _____ **P-** _____ **P-** _____

Person completing this form: Matt Chasm Date:

(revised 5/18)

Data Form A
ABATEMENT DEVICE

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

375 Beale Street, Suite 600. . . San Francisco, CA 94105. . . (415) 749-4990 . . . FAX (415) 749-5030

for office use only

Abatement Device: Equipment/process whose primary purpose is to reduce the quantity of pollutant(s) emitted to the atmosphere.

1. Business Name: Argent Materials INC Plant No: _____ (If unknown, leave blank)
2. Name or Description Sprinkler System Abatement Device No: A-2
3. Make, Model, and Rated Capacity _____
4. Abatement Device Code (See table*) 68 Date of Initial Operation _____
5. With regard to air pollutant flow into this abatement device, what sources(s) and/or abatement device(s) are **immediately** upstream?

   S- 1 **S-** _____ **S-** _____ **S-** _____ **S-** _____
   S- _____ **A-** _____ **A-** _____ **A-** _____ **A-** _____ **A-** _____
6. Typical gas stream temperature at inlet: _____ °F

If this form is being submitted as part of an application for an ***Authority to Construct***, completion of the following table is mandatory. If not, and the Abatement Device is *already in operation*, completion of the table is requested but not required.

	Pollutant	Weight Percent Reduction (at typical operation)	Basis Codes *(See Table**)*
7.	Particulate	95	8
8.	Organics		0
9.	Nitrogen Oxides (as NO_2)		0
10.	Sulfur Dioxide		0
11.	Carbon Monoxide		0
12.	Other:		
13.	Other:		

14. ☐ Check box if this Abatement Device burns fuel; complete lines 1, 2 and 15-36 on Form C (using the Abatement Device No. above for the Source No.) and attach to this form.
15. With regard to air pollutant flow from this abatement device, what sources(s), abatement device(s) and/or emission point(s) are ***immediately*** downstream?

    S- _____ **A-** _____ **A-** _____ **A-** _____ **P-** _____ **P-** _____

Person completing this form: Matt Chasm Date:

(revised 5/18)

Data Form A
ABATEMENT DEVICE

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

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for office use only

Abatement Device: Equipment/process whose primary purpose is to reduce the quantity of pollutant(s) emitted to the atmosphere.

1. Business Name: Argent Materials INC Plant No: _____ (If unknown, leave blank)
2. Name or Description Gorilla snot Abatement Device No: A- 3
3. Make, Model, and Rated Capacity _____
4. Abatement Device Code (See table*) 65 Date of Initial Operation _____
5. With regard to air pollutant flow into this abatement device, what sources(s) and/or abatement device(s) are **immediately** upstream?

   S- 3 **S-** _____ **S-** _____ **S-** _____ **S-** _____
   S- _____ **A-** _____ **A-** _____ **A-** _____ **A-** _____ **A-** _____
6. Typical gas stream temperature at inlet: _____ °F

If this form is being submitted as part of an application for an ***Authority to Construct***, completion of the following table is mandatory. If not, and the Abatement Device is *already in operation,* completion of the table is requested but not required.

	Pollutant	Weight Percent Reduction (at typical operation)	Basis Codes *(See Table**)*
7.	Particulate	85	8
8.	Organics		0
9.	Nitrogen Oxides (as NO_2)		0
10.	Sulfur Dioxide		0
11.	Carbon Monoxide		0
12.	Other:		
13.	Other:		

14. ☐ Check box if this Abatement Device burns fuel; complete lines 1, 2 and 15-36 on Form C (using the Abatement Device No. above for the Source No.) and attach to this form.
15. With regard to air pollutant flow from this abatement device, what sources(s), abatement device(s) and/or emission point(s) are ***immediately*** downstream?

    S- _____ **A-** _____ **A-** _____ **A-** _____ **P-** _____ **P-** _____

Person completing this form: Matt Chasm Date:

(revised 5/18)

Data Form A
ABATEMENT DEVICE

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

375 Beale Street, Suite 600. . . San Francisco, CA 94105. . . (415) 749-4990 . . . FAX (415) 749-5030

for office use only

Abatement Device: Equipment/process whose primary purpose is to reduce the quantity of pollutant(s) emitted to the atmosphere.

1. Business Name: Argent Materials INC Plant No: _____ (If unknown, leave blank)

2. Name or Description Water truck Abatement Device No: A- 4

3. Make, Model, and Rated Capacity _____

4. Abatement Device Code (See table*) 68 Date of Initial Operation _____

5. With regard to air pollutant flow into this abatement device, what sources(s) and/or abatement device(s) are **immediately** upstream?

   S- 1 **S-** 2 **S-** 3 **S-** _____ **S-** _____
   S- _____ **A-** _____ **A-** _____ **A-** _____ **A-** _____ **A-** _____

6. Typical gas stream temperature at inlet: _____ ↳F

If this form is being submitted as part of an application for an ***Authority to Construct***, completion of the following table is mandatory. If not, and the Abatement Device is *already in operation,* completion of the table is requested but not required.

	Pollutant	Weight Percent Reduction (at typical operation)	Basis Codes *(See Table**)*
7.	Particulate	95	8
8.	Organics		0
9.	Nitrogen Oxides (as NO_2)		0
10.	Sulfur Dioxide		0
11.	Carbon Monoxide		0
12.	Other:		
13.	Other:		

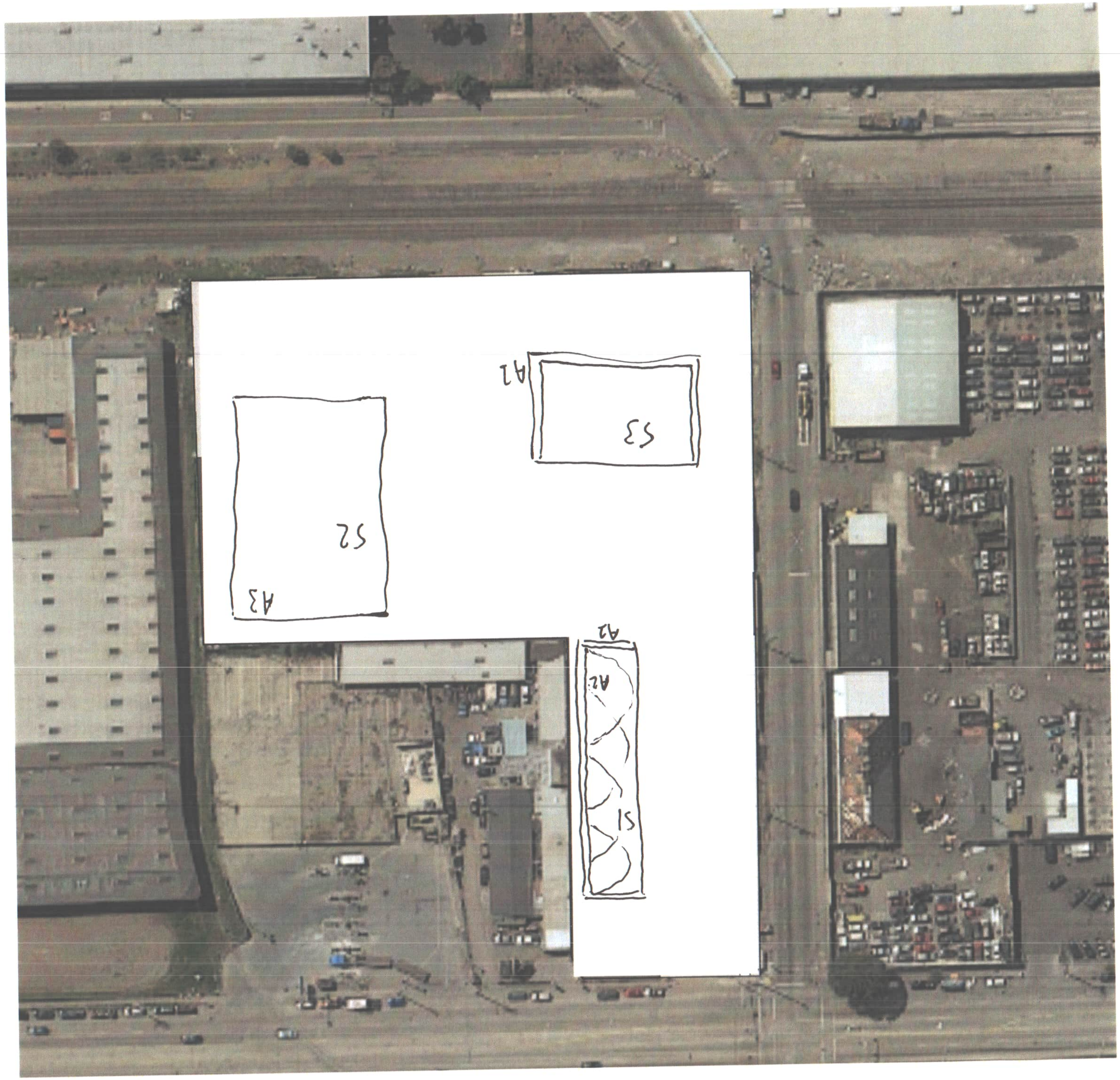
14. ☐ Check box if this Abatement Device burns fuel; complete lines 1, 2 and 15-36 on Form C (using the Abatement Device No. above for the Source No.) and attach to this form.

15. With regard to air pollutant flow from this abatement device, what sources(s), abatement device(s) and/or emission point(s) are ***immediately*** downstream?

   S- _____ **A-** _____ **A-** _____ **A-** _____ **P-** _____ **P-** _____

Person completing this form: Matt Chasm Date:

(revised 5/18)


A1
S3
S2
A3
A2
A2
S1

Sent: Wednesday, November 16, 2022 11:42 AM
To: Matt Chasm <Matt@argentmaterials.com>
Cc: Bill Crotinger <bill@argentmaterials.com>
Subject: RE: application number 30122

Ex. 7

Sorry, I meant to include a link to the HRA form:
https://www.baaqmd.gov/~/media/files/engineering/forms/permit-application/hra.pdf?la=en&rev=598afbb98ca343ab988ba37f6d6e6303

From: Ryan Atterbury
Sent: Wednesday, November 16, 2022 11:39 AM
To: Matt Chasm <Matt@argentmaterials.com>
Cc: Bill Crotinger <bill@argentmaterials.com>
Subject: RE: application number 30122

Hi Matt,

The main issue is engineering time and availability, sorry.
Can you provide the acreage of the stockpile(s)?
It looks like (from the previously submitted map) that there are at least two stockpiles. Is correct? I will need to modify the invoice to reflect this.
It also looks like the hauler roads will need a risk screen, with or without water spray abatement (which you said is not used on the hauler roads). The PM emissions from the roads look like they are under 5 tpy, so they can qualify for the exemption in 2-1-115.1.5, but they will still need to comply with TBACT if it is triggered. This depends on the risk level determined in the risk screen. I will also need to determine TBACT for hauler roads if it is triggered.

Please fill out form HRA for the stockpile(s) and the hauler roads (). I will also need to modify the invoice for the risk screen.

Thanks,
Ryan

From: Matt Chasm <Matt@argentmaterials.com>
Sent: Tuesday, November 15, 2022 12:24 PM
To: Ryan Atterbury <ratterbury@baaqmd.gov>
Cc: Bill Crotinger <bill@argentmaterials.com>
Subject: Re: application number 30122

Good morning Ryan,
Where are we on this permit application? As I recall we completed all the necessary steps, what further action is required for us to finalize?

Thank you,
Matt

Sent from my iPhone

> On Sep 15, 2020, at 2:45 PM, Ryan Atterbury <ratterbury@baaqmd.gov> wrote:
>
> Hi Matt,
>
> Sorry again for being slow. I responded to the older email. Let me know if you have any questions.
>
> Thanks,
> Ryan
>
> ---
>
> **From:** Matt Chasm <Matt@argentmaterials.com>
> **Sent:** Thursday, September 10, 2020 1:02 PM
> **To:** Ryan Atterbury <ratterbury@baaqmd.gov>
> **Cc:** Bill Crotinger <bill@argentmaterials.com>
> **Subject:** application number 30122
>
> Good afternoon Ryan,
> I am following up on our application 30122 from last year. I believe that I supplied all the required information, and I just confirmed with my corporate office that we paid the invoice last year. We had a visit from a BAAQMD Inspector this morning, and I would like to ensure that we have our permit in place for the next time. Please let me know if there is anything else you need to move forward on this.
> Thank you,
> Matt Chasm
> (415) 686-6051