



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippetts, Director

August 29, 2017

Patrick Clark, Environmental Advisor
Staker Parson Companies dba Idaho Materials and Construction-00265
2350 S 1900 W
Ogden, UT 84401

RE: Facility ID No., 777-00265, Project No., 61931, Staker Parson Companies dba Idaho
Materials and Construction-00265, Portable
Facility Name Change by Permit to Construct Revision

Dear Mr. Clark:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2017.0046, Project 61931, to change the name of the facility from Mountain Home Redi-Mix 777-00265, to Staker Parson Companies dba Idaho Materials and Construction-00265. This PTC is issued in accordance with IDAPA 58.01.01.209.04 of the Rules for the Control of Air Pollution in Idaho and is based on the certified information received on August 7, 2017. The facility name change is based on the following information:

Previous Facility Information

Permittee:	Mountain Home Redi-Mix 777-00265
Mailing Address:	150 East 10 th North, Mountain Home, ID 83647
Facility Location:	Portable
Facility Contact:	Richard L. Berry, Plant Manager/Owner
Phone Number:	(208) 587-8491
Responsible Official:	Richard L. Berry, Plant Manager/Owner
Phone Number:	(208) 587-8491

Updated Facility Information

Permittee:	Staker Parson Companies dba Idaho Materials and Construction-00265
Mailing Address:	2350 S 1900 W, Ogden, UT 84401
Facility Location:	Portable
Facility Contact::	Patrick Clark, Environmental Advisor
Phone Number:	(801) 430-3116
E-mail Address:	pclark@oldcastlematerials.com
Responsible Official:	Patrick Clark, Environmental Advisor
Phone Number:	(801) 430-3116

This permit is effective immediately and replaces PTC No. P-777-00265, issued July 11, 2000. This permit does not release Staker Parson Companies dba Idaho Materials and Construction-00265 from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, Air Quality Compliance Officer, at (208) 373-0419 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

If you have any questions, please contact Christina Boulay at (208) 373-0502 or Christina.Boulay@deq.idaho.gov.

Sincerely,



Mike Simon
Stationary Source Program Manager
Air Quality Division

Attachment

MS/cb

Permit No. P-2017.0046 PROJ 61931

Air Quality

PERMIT TO CONSTRUCT

Permittee Staker Parson Companies dba Idaho Materials and Construction-00265
Permit Number P-2017.0046
Project ID 61931
Facility ID 777-00265
Facility Location Portable

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued August 29, 2017


Christina Boulay, Permit Writer


Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is the revised permit to construct (PTC) for a name change of the portable concrete batch plant from Mountain Home Redi-Mix 777-00265 to Staker Parson Companies dba Idaho Materials and Construction-00265.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. 777-00265, issued on July 11, 2000.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment	Emissions Points
2	<u>Concrete Batch Plant – Truck</u> Manufacturer: Ross Model: Sidewinder Maximum Capacity (cy/hr): 100	<u>Cement Storage Silo Baghouse</u>	<u>Cement Storage Silo Baghouse Stack</u> Stack Height (ft): 19 Stack Diameter (ft): 3.17 Exit Air Flowrate (acfm): 560 Capture Efficiency: ~100%
2	<u>Generator</u> Manufacturer: Onan Model: DGFA 150 Rated Power Output (kw): 150 Fuel Type: Diesel Fuel Usage (gal/hr): 9.9	None	<u>Generator Stack</u> Stack Diameter (ft): 0.417 Stack Height (ft): 12 Exhaust Gas Flowrate (acfm): 1170 Exhaust Gas Temperature (°F): 1045

2 Concrete Batch Plant-Statewide Requirements

2.1 Process Description

Concrete is produced by combining water, sand and gravel, and portland cement. A portable concrete batch plant consists of storage bins for the sand and gravel, a storage silo for the cement, weigh bins that weigh each component, a conveyor, a water supply, and a control panel. Sand and gravel are either produced on site or purchased elsewhere. Typically, three or four different sizes of gravel and one or two different sizes of sand are stockpiles for varying job specifications. Cement is delivered by truck and pneumatically transferred to its storage silo. A baghouse is mounted above the silo to capture cement as air is displaced in the silo. For this source category, the baghouse is considered process equipment primarily, and air pollution control equipment secondarily. Power to run the facility is provided by the local utility, or a gasoline-fired or diesel-fired generator.

After all the storage bins are filled, the production process begins when sand and gravel are drop-fed into their respective weigh bins. When a pre-determined amount of each is weighed, the sand and gravel is drop-fed onto an inclined conveyor which transfers the mixture into a cement truck. A pre-determined amount of cement is also weighed and drop-fed through a rubber chute into the cement truck. The rubber chute directs the cement and provides a measure of dust control. Sometimes, a separate baghouse is used to capture cement dust from the cement weigh bin. Water is then added, and the components are mixed in the truck on the way to the job site.

The Standard PTC requested will allow this concrete batching facility to collocate and simultaneously operate with one other portable plant (i.e., rock crusher, hot-mix asphalt, or concrete batch plant) in attainment areas. It is important to note that during collocated operations, this concrete batching facility is then part of a single, larger source engaged in the production of either concrete, aggregate and/or asphalt, depending upon which type of portable plant the concrete batching facility is collocated with. While collocated, the two portable plants are now considered to be one source, and the emissions of this single source are the sum of the emissions from the two portable plants. This single, larger source must comply with all applicable federal, state, and local requirements. To maintain compliance, specific requirements and limitations have been included in the Standard PTC for this concrete batching facility for collocated operations. Specific conservative assumptions and calculations were made *to* determine these Standard PTC collocation requirements. For this reason, the permit for the other portable plant with which this concrete batching facility will collocate must also contain specific collocation requirements based on the same conservative assumptions and calculations used in this Standard PTC.

2.2 Control Device Descriptions

A baghouse is mounted above the silo to capture cement as air is displaced in the silo. For this source category, the baghouse is considered process equipment primarily, and air pollution control equipment secondarily. Sometimes, a separate baghouse is used to capture cement dust from the cement weigh bin.

Emission Limits

2.3 Opacity Limit

Emissions emanating from any stack, vent, or other functionally equivalent opening, shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required in IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.

2.4 Visible Emission Limits at Property Boundary

Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. Visible emissions shall be determined by Method 22, as described in 40 CFR Part 60, Appendix A, or a DEQ-approved alternative method.

2.5 Sulfur Content of Fuel

The facility shall comply with IDAPA 58.01.01.725 which limits the sulfur content of distillate fuel to 0.3 percent sulfur by weight for ASTM Grade 1 fuel oil and 0.5 percent sulfur by weight for ASTM Grade 2 fuel oil.

Operating Requirements

2.6 Reasonable Control of Fugitive Emissions

In accordance with IDAPA 58.01.01.650-651, all reasonable precautions shall be taken to prevent particulate matter from becoming airborne.

In determining what are reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions which might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
- Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust;
- Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust;
- Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;

- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
- Paving of roadways and their maintenance in a clean condition, where practical; or
- Prompt removal of earth or other stored material from streets, where practical.

2.7 Fugitive Dust Control Plan

Within sixty (60) days of issuance of the permit, the permittee shall have developed and submitted to the appropriate DEQ Regional Office, for DEQ approval, a Fugitive Dust Control Plan for this concrete batch plant. This plan shall include the following information:

- Identify and list all areas of operations where fugitive dust may be generated (i.e. haul roads, vehicle traffic areas, storage piles, transfer points, etc.).
- For each fugitive dust source listed, identify and describe the type of control methods and procedures to be used to control fugitive emissions (i.e. application of water or chemical dust suppressants, covering open trucks transporting dusty material, paving of roadways, etc.).
- The plan shall include a log to record when each fugitive dust source is controlled and the type of control used. A sample copy of the log shall be submitted to DEQ with the Fugitive Dust Control Plan for DEQ approval.

2.8 Operations and Maintenance Manual Requirements

Within sixty (60) days after startup, the Permittee shall have developed an Operations and Maintenance (O&M) Manual for the air pollution control device which describes the procedures that shall be followed to comply with General Provision 6.2 and the air pollution control device requirements contained in this permit. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.9 Monitoring Equipment

The Permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to measure the pressure differential across the air pollution control equipment.

2.10 Pressure Drop Across Air Pollution Control Device

The pressure drop across the air pollution control device shall be maintained within the manufacturers and O&M Manual's specifications. Documentation of both manufacturer's and O&M Manual's operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

2.11 Operating Parameters

The following operating parameters shall be monitored and recorded. The most recent five (5) year's compilation of data shall be kept on site, in a log, and shall be made available to DEQ representatives upon request.

- Monthly concrete production shall be determined by summing daily production over the previous calendar month. Consecutive 12-months of concrete production shall be determined by summing the monthly production over the previous consecutive 12 month period to demonstrate compliance with the consecutive 12-months Concrete Production Limits permit condition.
- Pressure drop across the air pollution control device once per week.
- Concrete production in cubic yards per day (cy/day) and cubic yards per month (cy/mo).

2.12 Reasonable Control Measures

The Permittee shall monitor and record in a log, during operation, the periodic method's used to reasonably control fugitive emissions from this facility. The log shall include the type of control used (e.g., water, environmentally safe chemical dust suppressants, etc.) as well as the circumstances under which no controls are used. The most recent five (5) year's compilation of data shall be kept on site and shall be made available to DEQ representatives upon request.

2.13 Monitor Generator Hours of Operation

The Permittee shall monitor and record the generator's hours of operation on a daily basis if generator hours of operation are limited in sections 3, 4, or 5 of this permit. The most recent five (5) year's compilation of data shall be kept on site, in a log, and shall be made available to DEQ representatives upon request.

Reporting Requirements

2.14 Relocation

In accordance with IDAPA 58.01.01.500, at least 10 days prior to relocating any of the permitted equipment, the permittee shall submit a completed DEQ Portable Equipment Relocation Form (PERF) to the following address or fax number:

PERF Processing Unit
DEQ – Air Quality
1410 N. Hilton
Boise, ID 83706-1255
Ph.: (208) 373-0502
Fax: (208) 373-0340

2.15 Certificate Documents

All documents including, but not limited to, application forms for Permits to Construct, monitoring data, supporting information, requests for confidential treatment, testing reports, and compliance certifications submitted to DEQ shall contain a certification by a responsible official in accordance with IDAPA 58.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

3 Attainment or Unclassifiable Area Requirements When Not Collocated

The Permittee shall comply with the conditions in Section 2 of this permit and the following permit conditions when the concrete batching facility is operated in any attainment or unclassifiable areas, and when it is not collocated, within the State of Idaho.

Operating Requirements

3.1 Facility Throughput Limits

The production rate of the concrete batching facility is unlimited while operating in any attainment or unclassifiable area.

3.2 Collocation Requirements

When the concrete batching facility is to be collocated with another portable concrete batch plant, rock crushing plant, or hot-mix asphalt plant; the collocation requirements of Section 4 of this permit must be complied with.

3.3 Generator Hours of Operation

The generator(s) may operate unlimited hours. Therefore, no monitoring or recordkeeping are required when collocated with another concrete batch plant, rock crushing plant, or hot-mix asphalt plant.

4 Attainment or Unclassifiable Area Requirements When Collocated

The Permittee shall comply with the conditions in Section 2 of this permit and the following permit conditions when the concrete batching facility is to be collocated with another portable concrete batch plant, rock crushing plant, or hot-mix asphalt plant within the State of Idaho. The concrete batching facility may only collocate with either one (1) portable rock crushing plant, one (1) portable hot-mix asphalt plant, or one (1) other portable concrete batch plant which has been permitted to specifically allow collocation.

Operating Requirements

4.1 Collocation Areas

The concrete batching facility may collocate in attainment or unclassifiable areas only. The Permittee shall not collocate in a nonattainment area or proposed nonattainment area without obtaining a Permit which specifically allows for collocation in a nonattainment area.

4.2 Number of Portable Sources

The concrete batching facility may only collocate with either one (1) portable rock crushing plant, one (1) portable hot-mix asphalt plant, or one (1) other portable concrete batch plant which has been permitted to specifically allow collocation.

4.3 Facility Throughput Limits

The production rate of the concrete batching facility shall not exceed a maximum of four hundred thirty-eight thousand cubic yards per any consecutive 12-month period (438,000 cy/yr) when collocated with another concrete batch plant, rock crushing plant, or hot-mix asphalt plant.

4.4 Generator Hours of Operation

The generator shall not be operated more than four thousand, three hundred and eighty hours per consecutive 12-month period (4,380 hr/yr) when collocated with another concrete batch plant, rock crushing plant, or hot mix asphalt plant.

5 Nonattainment Area Requirements

The Permittee shall comply with the conditions in Section 2 of this permit and the following permit conditions when the concrete batching facility is operated in any PM-10 nonattainment areas within the State of Idaho. While operating the concrete batching facility under the conditions set forth in Section 5, the concrete batching facility may not collocate with any other facility.

Operating Requirements

5.1 Facility Throughput Limits

The production rate of the concrete batching facility shall not exceed a maximum of five hundred and three cubic yards per day (503 cy/day). In addition, the production rate of the concrete batching facility shall not exceed a maximum of one hundred eighty-three thousand six hundred and seventy-eight cubic yards per any consecutive 12-month period (183,678 cy/yr) when operating in any PM-10 nonattainment area or proposed PM-10 nonattainment area.

5.2 Collocation Requirements

The concrete batching facility shall not be collocated with another portable concrete batch plant, rock crushing plant, or hot-mix asphalt plant when located in any PM-10 nonattainment area or proposed PM-10 nonattainment area.

5.3 Generator Hours of Operation

The generator shall not be operated more than one thousand eight hundred thirty-seven hours per any consecutive 12-month period (1,837 hr/yr) when operating in any PM-10 nonattainment area or proposed PM-10 nonattainment area. In addition, the generator shall not be operated more than five hours per day (5 hr/day) when operating in any PM-10 nonattainment area or proposed PM-10 nonattainment area.

6 General Provisions

General Compliance

6.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the “Rules for the Control of Air Pollution in Idaho.” The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the “Rules for the Control of Air Pollution in Idaho,” and the Environmental Protection and Health Act (Idaho Code §39-101, et seq)

[Idaho Code §39-101, et seq.]

6.2 The permittee shall at all times (except as provided in the “Rules for the Control of Air Pollution in Idaho”) maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

6.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

6.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

6.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

6.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 6.7** If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 6.8** All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 6.9** Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

- 6.10** The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

- 6.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 6.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

- 6.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

- 6.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

- 6.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

- 6.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]