



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor  
Toni Hardesty, Director

November 4, 2009

Patrick Clark, Environmental Advisor  
Staker Parson Companies dba Idaho Concrete Company  
PO Box 3429  
Ogden, UT 84409

RE: Facility ID No. 777-00298, Staker Parson Companies dba Idaho Concrete Company, Mtn. Home  
Final Permit Letter

Dear Mr. Clark:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2009.0130 to Staker Parson Companies dba Idaho Concrete Company for a facility name change at Mountain Home, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on October 14, 2009. This permit is effective immediately and replaces PTC No. P-010031, issued on March 15, 2002, the terms and conditions of which no longer apply. This permit does not release Staker Parson Companies dba Idaho Concrete Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Eric Clark at (208) 373-0502 or [Eric.Clark@deq.idaho.gov](mailto:Eric.Clark@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

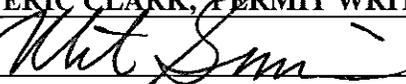
Sincerely,

A handwritten signature in black ink that reads "Mike Simon". The signature is written in a cursive, flowing style.

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\EC

Project No. P-2009.0130

<b>Air Quality</b> <b>PERMIT TO CONSTRUCT</b> <b>State of Idaho</b> <b>Department of Environmental Quality</b>	<b>PERMIT NUMBER</b>	<b>CLASS</b>	<b>SIC</b>
	P-2009.0130	B	3273
	<b>FACILITY ID</b>	<b>AQCR</b>	<b>NAICS</b>
	777-00298	Portable	327320
	<b>ZONE</b>	<b>UTM COORDINATES (km)</b>	
Portable	Portable	Portable	
<b>PERMITTEE</b>			
Staker Parson Companies dba Idaho Concrete Company			
<b>PROJECT</b>			
Permit to construct revision – Facility Name Change			
<b>MAILING</b>	<b>CITY</b>	<b>STATE</b>	<b>ZIP</b>
PO Box 3429	Ogden	UT	84409
<b>FACILITY</b>	<b>TITLE</b>	<b>TELEPHONE</b>	
Patrick Clark	Environmental Advisor	(801) 409-2415	
Mike Hopkins	Area Manager	(801) 587-8491	
<b>RESPONSIBLE</b>	<b>TITLE</b>	<b>TELEPHONE</b>	
Patrick Clark	Environmental Advisor	(801) 409-2415	
<b>EXACT PLANT LOCATION</b>		<b>COUNTY</b>	
150 East 10 <sup>th</sup> North, Mountain Home, Idaho		Portable: Initial - Elmore	
<b>GENERAL NATURE OF BUSINESS &amp; KINDS OF PRODUCTS</b>			
Concrete Batch Plant			
<b>PERMIT AUTHORITY</b>			
<p>This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and 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.</p> <p>This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the 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.</p> <p>This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.</p> <p>This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.</p>			
		<b>DATE ISSUED</b>	March 15, 2002
ERIC CLARK, PERMIT WRITER			
		<b>DATE MODIFIED/REVISED</b>	November 4, 2009
MIKE SIMON STATIONARY SOURCE MANAGER			

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## PERMIT TO CONSTRUCT SCOPE

### Purpose

1. This is a modification of a permit to construct for a facility name change.
2. Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
3. This PTC replaces Permit to Construct No. P-010031, issued on March 15, 2002, the terms and conditions of which shall no longer apply.
4. The emission sources regulated by this permit are listed in the following table.

**Table 1 REGULATED SOURCES**

Source Descriptions	Emission Controls
<u>Concrete Batch Plant – Truck Mix</u> Manufacturer: McNeilus Model: Batchmaster12 Manufacturer Date: March 18, 2001 Maximum production: 200 cy/hr and 1,000,000 cy/year	<u>Cement Storage Silo Baghouse No. 1<sup>a</sup>:</u> Manufacturer: McNeilus Model: SFV270  <u>Cement Supplement Storage Silo Flyash Baghouse No. 2<sup>a</sup>:</u> Manufacturer: McNeilus Model: SFV270  <u>Weigh Batcher Boot:</u> Manufacturer: McNeilus Model: CJP50 Control Efficiency: 99.995%

a. Both the storage silo baghouse and supplement storage silo flyash baghouse are considered process equipment. PM<sub>10</sub> controlled emission factors were used when determining PTE and for modeling purposes.

[November 4, 2009]

## CONCRETE BATCH PLANT

### ***Process Description***

5. Combining water, sand, gravel, and Portland cement produces concrete. 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 onsite or purchased elsewhere. Typically, three to four different sizes of gravel and one to two different sizes of sand are stockpiled 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. Power to run the facility is provided by the local utility, or a gasoline- 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 predetermined 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.

### ***Emission Limits***

6. **Opacity Limit**

Emissions from any stack, vent, or functionally equivalent opening associated with the Concrete Batch Plant, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

7. **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 minutes in any 60-minute period. Visible emissions shall be determined by Method 22, as described in 40 CFR Part 60, Appendix A, or a Department-approved alternative method.

### ***Operating Requirements***

8. **Reasonable Control of Fugitive Emissions**

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. 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, 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, when 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.
- Prompt removal of earth or other stored material from streets, where practical.

9. **Operations and Maintenance Manual Requirements**

Within 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 20 and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.

10. **Monitoring Equipment**

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

11. **Pressure Drop Across Air Pollution Control Device**

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

***Monitoring and Recordkeeping Requirements***

12. **Operating Parameters**

The following operating parameters shall be monitored and recorded. A compilation of the most recent two years of data shall be kept onsite in a log and shall be made available to Department representatives upon request.

- Pressure drop readings 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)

13. **Reasonable Control Measures**

The permittee shall monitor and record, during operation, the periodic method(s) used to reasonably control fugitive emissions from this facility. The records 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. A compilation of the most recent two years of data shall be kept onsite and shall be made available to Department representatives upon request.

## ***Reporting Requirements***

### 14. **Relocation**

All existing portable equipment shall be registered. At least 10 days prior to relocation of any equipment covered by this permit, the permittee shall submit a complete Portable Equipment Registration and Relocation Form (available on the Department website at: [www2.state.id.us/deq/air/](http://www2.state.id.us/deq/air/)) in accordance with IDAPA 58.01.01.500, and a scaled plot plan to:

PERF Processing Unit  
Idaho DEQ - Air Quality  
1410 N. Hilton  
Boise, ID 83706-1255

### 15. **Certification of 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 the Department 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.

## ***Attainment Requirements***

### 16. **Operation in Attainment or Unclassifiable Areas without Collocation**

If not collocating with another facility the following requirements must be adhered to:

The production rate of the concrete-batching facility shall not exceed 1,752,000 cubic yards per any consecutive 12-month period while operating in any attainment or unclassifiable area.

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 Permit Condition 17 must be complied with.

[November 4, 2009]

### 17. **Collocation in Attainment or Unclassifiable Areas**

If collocating with another permitted facility the following requirements must be adhered to:

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

The production rate of the concrete-batching facility shall not exceed a maximum of 876,000 cubic yards per any consecutive 12-month period when collocated with another concrete batch plant, rock-crushing plant, or hot-mix asphalt plant.

[November 4, 2009]

## ***Nonattainment Requirements***

### 18. **Nonattainment Operations**

If operating in a nonattainment area the following requirements must be adhered to:

The production rate of the concrete-batching facility shall not exceed 1,752,000 cubic yards per any consecutive 12-month period when located in any PM<sub>10</sub> nonattainment area or proposed PM<sub>10</sub> nonattainment area.

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<sub>10</sub> nonattainment area or proposed PM<sub>10</sub> nonattainment area.

[November 4, 2009]

## PERMIT TO CONSTRUCT GENERAL PROVISIONS

### **General Compliance**

19. 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 and 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.]
20. 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]
21. 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**

22. 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 or 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**

23. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
- A notification of the date of initiation of construction, within five working days after occurrence;
  - 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;
  - 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, 5/1/94]

### ***Performance Testing***

24. 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, at its option, may 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.
25. 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.
26. Within 30 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]

### ***Monitoring and Recordkeeping***

27. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information 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 and 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***

28. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

### ***Certification***

29. 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***

30. 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***

31. 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***

32. 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***

33. 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]