



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR
TONI HARDESTY, DIRECTOR

February 9, 2007

Certified Mail No. 7005 1160 0000 1550 8715

Patrick Clark
Staker & Parson Companies
P. O. Box 3429
Ogden, Utah 84409

RE: Facility ID No. 777-00394, Staker & Parson dba Idaho Concrete Company, Eagle
Final Permit to Construct No. P-2007.0001

Dear Mr. Clark:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0001 to Staker & Parson dba Idaho Concrete Company 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 December 27, 2006. This permit is effective immediately and replaces Tier II Operating Permit No. T2-000034, issued on December 3, 2001, the terms and conditions of which no longer apply. This permit does not release Staker & Parson dba Idaho Concrete Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact Leonard Herr, Boise Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

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 Jonathan Pettit at (208) 373-0443, or jonathan.pettit@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSJP\bf Project No. 2007.0001 Enclosures

c: Leonard Herr, Boise Regional Office
Bill Rogers, Permit Coordinator
Jonathan Pettit, Permit Writer
Marilyn Seymore/ Pat Rayne, Air Quality Division
Laurie Kral, US EPA Region 10
Permit Binder
Source File/ Betty Flowers
Phyllis Heitman (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality**

PERMIT No.: P-2007.0001
FACILITY ID No.: 777-00394
CLASS: SM **SIC:** 3273
UTM COORDINATE (km): Portable

1. **PERMITTEE**
Staker & Parson dba Idaho Concrete Company
2. **PROJECT**
Portable Concrete Batch Plant
3. **MAILING ADDRESS**
2755 E. State Street
- CITY**
Eagle
- STATE**
ID
- ZIP**
83616
4. **FACILITY CONTACT**
Eric St. Pierre
- TITLE**
Operations Manager
- TELEPHONE**
(208) 939-6831
5. **RESPONSIBLE OFFICIAL**
Eric St. Pierre
- TITLE**
Operations Manager
- TELEPHONE**
(208) 939-6831
6. **EXACT PLANT LOCATION**
Portable. Initial location in Eagle, ID
- COUNTY**
Portable. Initial location in Ada
7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
Concrete Production
8. **GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, 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.

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.

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

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.



**JONATHAN PETTIT, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY**



**MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: February 9, 2007

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
cy/hr	cubic yards per hour
cy/yr	cubic yards per year
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HMA	hot mix asphalt plant
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
O&M	operations and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0001

Permittee:	Staker & Parson dba Idaho Concrete Co.	Facility ID No. 777-00394
Location:	Eagle, Idaho	

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This Permit to Construct (PTC) is a permit revision to change facility ownership and to change the existing Tier II operating permit to a PTC.
- 1.2 This PTC replaces Tier II Operating Permit No. T2-000034 issued December 3, 2001, the terms and conditions of which shall no longer apply.

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Concrete Batch Plant – truck Mix, (or equivalent) 100 cubic yards of concrete per hour (cy/hr).	Baghouse and rubber boot enclosure.

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2. CONCRETE BATCH PLANT

2.1 Process Description

The facility is a portable truck mix concrete batch plant consisting of aggregate storage bin(s), a cement storage silo, cement supplement (fly ash) storage silo, weigh batcher, and conveyors. The design capacity of the plant is 100 cubic yards of concrete per hour. The plant combines sand, gravel, and cement, and transfers the mixture into a truck along with a measured amount of water for in-transit mixing of the concrete. Electrical power for the portable facility will be provided by the local electric utility.

2.2 Emissions Control Description

The particulate matter (PM) emissions from the cement storage silo, cement supplement (fly ash) storage silo, and the weigh batcher are controlled by baghouse, as described in Table 2.1. Fugitive PM emissions from material transfer points are controlled by operations being located inside a building that reduce the emissions by an estimated 70%. Fugitive PM emissions from the truck mix loadout are controlled by a rubber boot enclosure.

Table 2.1 CONTROL DESCRIPTION OF THE CONCRETE BATCH PLANT

Emissions Unit(s)/Processes	Emissions Control Device	Emissions Point
Concrete Batch	Baghouse	<u>Round Stack Baghouse:</u> Stack height: 60 feet Stack diameter: 0.88 feet Exit air flow rate: 795 acfm Control Efficiency: 99.9%
Materials Transfer: Truck Loading	Rubber Boot Enclosure	Truck Loadout Transfer Point

Emissions Limits

2.3 Emission Limits

Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM₁₀) emissions from the cement storage silo baghouse stack shall not exceed 0.7 pounds per hour (lb/hr) and 0.1 tons per any consecutive twelve (12) month period.

2.4 Opacity Limit

Emissions from the cement storage silo baghouse stack, or any other stack, vent, or functionally equivalent opening, shall not exceed 20 percent opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined by the procedure contained in IDAPA 58.01.01.625.

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2.5 Visible Emission Limits

Visible 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 EPA Reference Method 22 (as described in 40 CFR 60, Appendix A), or DEQ-approved alternative method.

2.6 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations 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, 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.

Operating Requirements

2.7 Throughput Limits

The permittee shall not produce more than 250,000 cubic yards of concrete per any consecutive 12-month period.

2.8 Pressure Drop Monitoring Device

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, pressure drop monitoring device to measure the pressure drop across the silo dust collector.

2.9 Operations and Maintenance Manual

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Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the silo dust collector. The O&M manual shall describe the procedures that will be followed to comply with General Provision 3.2 and the manufacturer specifications for the dust collector. The manual shall contain, at a minimum, the pressure drop range for the dust collector. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.10 Pressure Drop Across the Dust Collector

The pressure drop across the silo dust collector shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.11 Dust Collector Maintenance and Operation

The permittee shall maintain and operate the silo storage dust collector according to manufacturer and O&M manual specifications and recommendations to demonstrate compliance with Permit Conditions 2.3 and 2.4 and General Provision 3.2.

Monitoring and Recordkeeping Requirements

2.12 Concrete Production Monitoring

When the facility operates, the permittee shall monitor and record each day, and annual concrete production to demonstrate compliance with Permit Condition 2.7. Annual production shall be determined by summing each monthly production total over the previous consecutive 12-month period.

2.13 Visible Emissions Monitoring

The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, including the silo and weigh batcher baghouse stacks, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

2.14 Fugitive Dust Monitoring

The permittee shall conduct a weekly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to

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reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Each time fugitive dust emissions trigger correction of a dust control strategy or implementation of additional dust control strategies, the permittee shall monitor and record the trigger, the corrective action used, and the results achieved from the use of that control strategy or strategies.

2.15 Dust Collector Pressure Drop Monitoring

Once per day when operating, the permittee shall monitor and record the pressure drop across the dust collector to demonstrate compliance with Permit Condition 2.8. Records of this information shall remain on site for the most recent two (2) year period and shall be made available to DEQ representatives upon request.

Reporting Requirements

2.16 Relocation

At least 10 days prior to relocation of any equipment covered by this permit, the permittee shall submit a scaled plot plan and a complete Portable Equipment Relocation Form (PERF) in accordance with IDAPA 58.01.01.500, to the following address or fax number:

Air Quality Program Office – Application Processing
Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706-1255
Fax to: (208) 373-0340, Attention: Air Quality Program Office – Application Processing

Electronic copies of the PERF may be obtained from DEQ's website in both pdf and Word® versions at:

http://www.deq.idaho.gov/air/permits_forms/forms/ptc_relocation.pdf, or
http://www.deq.idaho.gov/air/permits_forms/forms/ptc_relocation.doc

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Location:	Eagle, ID	

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

- 3.1. 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 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.]**
- 3.2. 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]**
- 3.3. 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

- 3.4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- a. 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;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. 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

- 3.5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
- a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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- c. 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;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. 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

- 3.6. 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.

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.

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

- 3.7. 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]

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Excess Emissions

3.8. 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

3.9. 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

3.10. 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

3.11. 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

3.12. 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

3.13. 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.