



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

July 11, 2002

Dirk Kempthorne, Governor
C. Stephen Allred, Director

CERTIFIED MAIL # 7000 1670 0013 9128 7161

Eric St. Pierre, Operations Manager
Idaho Concrete Company, Portable Sources
2755 E. State St.
Eagle, ID 83616

RE: AIRS Facility Nos. 777-00034, 777-00147, 777-00148, 777-00149, and 777-00150
Idaho Concrete Co., Portable Concrete Batch Plants
Permits to Construct

Dear Mr. St. Pierre:

The Department of Environmental Quality (Department) is issuing amended Permit to Construct Nos. 777-00034, 777-00147, 777-00148, 777-00149, and 777-00150 for Idaho Concrete in accordance with IDAPA 58.01.01.200 through 223, *Rules for the Control of Air Pollution in Idaho*. The enclosed permits are effective immediately and are based on the information in your permit application received June 3, 2002. These permits do not release Idaho Concrete from compliance with all other applicable federal, state, or local laws, regulations, permits, and ordinances.

Steve VanZandt of the Twin Falls Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. In addition to your facility plant managers, the Department recommends that the following representatives of your firm also attend this meeting: responsible officials, environmental contacts, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, have the right to appeal this final agency action pursuant to IDAPA 58.01.23, *Rules of Administrative Procedure before the Board of Environmental Quality*. A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255 within 35 days of the date of this decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Dan Salgado, New Source Review Coordinator, at (208) 373-0431 to address any concerns you may have with the enclosed permits.

Sincerely,

Marjorie Martz Emerson
FOR

Katherine B. Kelly, Administrator
Air Quality Division

KK/DH/bh

Project Nos. P-020022A, P-020022B, P-020022C, P-020022D, and P-020022E
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Enclosures

cc: Joan Lechtenberg, Air Quality Division
Sherry Davis, Technical Services Division
Steve VanZandt, Twin Falls Regional Office
Laurie Kral, EPA Region 10



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT NO.: 777-00149

CLASS: B

SIC: 3273

1. PERMITTEE
Staker & Parsons Co. dba Idaho Concrete Co. (Idaho Concrete Co.)

2. PROJECT
Portable concrete batch plant

3. MAILING ADDRESS 2755 E. State St.	CITY Eagle	STATE ID	ZIP 83616
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4. FACILITY CONTACT Eric St. Pierre	TITLE Operations Manager	TELEPHONE (208) 939-6831
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5. RESPONSIBLE OFFICIAL Eric St. Pierre	TITLE Operations Manager	TELEPHONE (208) 939-6831
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6. EXACT PLANT LOCATION Portable	COUNTY Portable
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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 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 Idaho Department of Environmental Quality (Department) 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 is not transferable to another person, place, or piece or set of 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 Department approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

Marjorie Martz Emerson for
KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: JULY 11, 2002

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 777-00149

Permittee: Idaho Concrete Co.
Location: Portable

Date Issued: July 11, 2002

I. SOURCE DESCRIPTION

1.1 Process Description

A portable concrete batch plant is used to combine sand, gravel(s), cement, fly ash, and water to produce concrete. Fly ash may be omitted.

1.2 Equipment Listing

The following equipment or equivalent is covered by this permit to construct.

- Portable Concrete Batch Plant
Maximum capacity: 900 cubic yard per hour (cy/hr)
Maximum capacity: 1,800 tons per hour
- Associated aggregate process, handling, and transport equipment

1.3 Control Equipment

- Cement Storage Silo Baghouse(s)
Efficiency Percentage: 99.6% at <10 microns
- Cement Weight Batcher Baghouse
Efficiency Percentage: 99.6% at <10 microns

EMISSION LIMITS

1.4 Baghouse Stack Emission Limit

Emissions of particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) from the cement-silo-storage-baghouse exhaust stack and cement-weight-batcher-baghouse exhaust stack shall not exceed any corresponding emission rate limit listed in the appendix.

[IDAPA 58.01.01.211]

1.5 Opacity Limits

Emissions emanating from any stack, vent, or other functionally equivalent opening, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625. Opacity shall be determined using procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625]

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1.6 Visible Fugitive Emission Limits at Property Boundary

Visible 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.

[IDAPA 58.01.01.211]

OPERATING REQUIREMENTS

1.7 Maximum Concrete Production Rate

The maximum concrete production rate of the batch plant shall not exceed 900 cy/hr or 7,884,000 cubic yards per year (cy/yr).

[IDAPA 58.01.01.211]

1.8 Control of Fugitive Emissions

Fugitive particulate emissions resulting from the operation of the portable concrete batch plant, traffic on haul roads, traffic areas, and all aggregate handling equipment shall be reasonably controlled as required in IDAPA 58.01.01.650.

Some of the reasonable precautions may include, but are not limited to, the following.

- Use of water or environmentally safe chemicals
- Application of dust suppressants
- Use of control equipment
- Covering of opened bodied trucks
- Paving
- Prompt removal of earth or other stored material from streets, where practical

[IDAPA 58.01.01.650]

1.9 Nonattainment Area Operations

The facility shall not operate in any PM₁₀ nonattainment area or any proposed PM₁₀ nonattainment area without prior Departmental approval.

[IDAPA 58.01.01.211]

1.10 Baghouse Maintenance and Operation

The permittee shall maintain and operate the baghouse according to manufacturer specifications and recommendations to ensure compliance with Permit Condition 1.5.

[IDAPA 58.01.01.211]

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1.11 Plant Reconfiguration

Plant operations may be reconfigured without prior notification to the Department.

[IDAPA 58.01.01.211]

MONITORING REQUIREMENTS

1.12 Operating Parameters

The concrete production shall be monitored on both a daily and annual basis. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.211]

1.13 Fugitive Control Monitoring

The permittee shall monitor and record on a daily basis and during operation, the method(s) used to reasonably control emissions from all sources listed in Permit Condition 1.8. The records shall include the type of control used (i.e., water, chemical dust suppressants, etc.) as well as the circumstances under which no controls are utilized. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.211]

REPORTING REQUIREMENTS

1.14 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 scaled plot plan and a complete Portable Equipment Registration and Relocation Form (available on the Department website at: ww2.state.id.us/deq/air/equip_relocat.htm) in accordance with IDAPA 58.01.01.500 to the following:

PERF Processing Unit
Idaho Department of Environmental Quality
Air Quality Division
1410 N. Hilton
Boise, ID 83706-1255

[IDAPA 58.01.01.500]

1.15 Certification of Documents

All documents, including, but not limited to, records, monitoring data, supporting information, testing reports or 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 are true, accurate, and complete.

[IDAPA 58.01.01.211]

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2. APPENDIX

IDAHO CONCRETE CO.

Portable Concrete Batch Plant
 Emissions Limits^a - Hourly (lb/hr) and Annual^b (T/yr)

BAGHOUSES	PM/PM ₁₀	
	lb/hr ^c	T/yr ^d
Cement silo baghouse	0.25	1.09
Cement-weight-batch baghouse	0.15	0.66
Total baghouse emissions	0.40	1.75

^a As determined by a pollutant specific EPA reference method, or Department-approved alternative, or as determined by the Department's emission estimation methods in this permit application.

^b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate, or by actual annual production rates.

^c pounds per hour

^d tons per year

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. 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.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack emissions testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify the Department, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If emissions testing is specified, the permittee must schedule such testing within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup. Such testing must strictly adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from the Department. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.

The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by the Department, unless (1) the test demonstrates noncompliance; (2) a more restrictive operating limit is specified elsewhere in this permit; or (3) at such an operating rate, emissions would exceed any emissions limit(s) set forth in this permit.

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7. 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.