



**STATE OF IDAHO**  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 N Hilton Street, Boise, ID 83706  
(208) 373-0502

Brad Little, Governor  
Jess Byrne, Director

December 22, 2021

Erik Neilson, RMC Manager  
Staker and Parson Companies dba Idaho Materials and Construction  
1310 Addison Ave. W  
Twin Falls, ID 83301

RE: Facility ID No. 777-00148, Project No. 62755, Staker and Parson Companies dba Idaho  
Materials and Construction, Burley  
Facility Name Change by Permit to Construct Revision

Dear Mr. Neilson:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2002.0210, Project 62755, to change the name of the facility from Staker & Parsons Co. dba Idaho Concrete Co. to Staker and Parson Companies dba Idaho Materials and Construction. 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 November 23, 2021. The facility name change is based on the following information:

**Previous Facility Information**

Permittee:	Staker & Parsons Co., dba Idaho Concrete Co.
Mailing Address:	1310 Addison Ave. W
Facility Location:	S 800 W, Burley, ID 83318
Facility Contact:	Andy Weigel, Environmental Specialist
Phone Number:	(208) 405-6715
E-mail Address:	andy.weigel@idahomaterials.com
Responsible Official:	Erik Neilson, RMC Manager
Phone Number:	(208) 466-5001

**Updated Facility Information**

Permittee:	Staker and Parson Companies dba Idaho Materials and Construction
Mailing Address:	1310 Addison Ave. W
Facility Location:	S 800 W, Burley, ID 83318
Facility Contact:	Andy Weigel, Environmental Specialist
Phone Number:	(208) 405-6715
E-mail Address:	andy.weigel@idahomaterials.com
Responsible Official:	Erik Neilson, RMC Manager
Phone Number:	(208) 466-5001

Mr. Neilson  
December 22, 2021  
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This permit is effective immediately and replaces PTC No. P-2002.0210, Project 62755, issued July 11, 2002. This permit does not release Staker and Parson Companies dba Idaho Materials and Construction 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 Bobby Dye, Regional Manager - Air Quality and Remediation Manager, at (208) 736-2190 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 Morrie Lewis at (208) 373-0502 or [Morrie.Lewis@deq.idaho.gov](mailto:Morrie.Lewis@deq.idaho.gov).

Sincerely,



Mike Simon  
Stationary Source Bureau Chief  
Air Quality Division

Attachment

MS/ml

Permit No. P-2002.0210 PROJ 62755

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** Staker and Parson Companies dba Idaho Materials and Construction  
**Permit Number** P-2002.0210  
**Project ID** 62755  
**Facility ID** 777-00148  
**Facility Location** Portable throughout the state of Idaho

### 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** December 22, 2021



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Morrie Lewis, Permit Writer



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Mike Simon, Stationary Source Bureau Chief

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# 1 Permit Scope

## Purpose

- 1.1 This is a revised permit to construct (PTC) to incorporate a name change from Staker & Parsons Co., dba Idaho Concrete Co. to Staker and Parson Companies dba Idaho Materials and Construction for the portable concrete batch plant. [12/22/2021]
- 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. [12/22/2021]
- 1.3 This PTC replaces Permit to Construct No. 777-00148, issued on July 11, 2002. [12/22/2021]

## Regulated Sources

### 1.4 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.

### 1.5 Regulated Sources

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

**Table 1.1 Regulated Sources**

Permit Sections	Source	Control Equipment
2, 3, 4	<u>Portable Concrete Batch Plant:</u> Maximum Capacity: 900 cubic yards/hr 1,800 tons/hr	<u>Cement Weight Batch Baghouse:</u> PM <sub>10</sub> control efficiency: 99.6%
2, 3, 4	<u>Cement Storage Silo:</u>	<u>Cement Storage Silo Baghouse:</u> PM <sub>10</sub> control efficiency: 99.6%
2, 3, 4	<u>Associated aggregate process, handling, and transport equipment</u>	Reasonable precautions

[12/22/2021]

## **2 Facility-Wide Conditions**

### **2.1 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.

### **2.2 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.

The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive dust emissions.

The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

The permittee shall conduct a daily facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust 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 dust 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 dust emissions, and the date the corrective action was taken.

[12/22/2021]

### **2.3 Fugitive Emissions Controls**

In accordance with IDAPA 58.01.01.650 and 651, the concrete batch plant shall employ efficient fugitive dust controls. The Permittee shall implement and maintain, but are not limited to, the following controls:

- Application, where practical, of water, or suitable chemicals to, or the covering of, dirt roads, material stockpiles, and other surfaces which can create dust. This fugitive dust control is employed at this facility and the Permittee shall be able to demonstrate this to DEQ staff.
- Installation and use, where practical, of hoods, fans, and fabric filters systems to enclose the handling of dusty materials. This fugitive dust control is employed at this facility and the Permittee shall be able to demonstrate this to DEQ staff.

Good operating practices, including water spraying or other suitable measures, shall be employed to prevent dust generation and atmospheric entrainment during operations such as stockpiling, screen changing and general maintenance. The Permittee shall be able to demonstrate this to DEQ staff.

[12/22/2021]

## **Relocation Requirements**

### **2.4 Relocation Requirements**

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, e-mail, or fax number:

PERF Processing Unit  
DEQ – Air Quality  
1410 N. Hilton  
Boise, ID 83706-1255  
Ph.: (208) 373-0502  
E-mail to: aqperf@deq.idaho.gov  
Fax: (208) 373-0340

[12/22/2021]

## **Non-attainment Area Operations**

### **2.5 Nonattainment Area Operations**

The permittee shall not move and operate any equipment authorized by this permit to any air quality non-attainment area in the State of Idaho.

[12/22/2021]

## **Odors**

### **2.6 Odors**

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution in accordance with IDAPA 58.01.01.776.01.

[12/22/2021]

### **2.7 Fugitive Dust Monitoring and Recordkeeping**

The permittee shall conduct a facility-wide inspection of potential sources of visible fugitive emissions during daylight hours and under normal operating conditions once each day that the

concrete batch plant operates, to demonstrate compliance with the Reasonable Control of Fugitive Emissions, the Fugitive Emissions Controls, and the Reasonable Control of Fugitive Emissions permit conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible fugitive emissions. If any visible fugitive emissions are present from any source of fugitive emissions, the permittee shall take appropriate corrective action as expeditiously as practicable to mitigate the visible fugitive emissions.

The permittee shall maintain records of the results of each see/no see evaluation of visible fugitive emissions inspection. The records shall include, at a minimum, the date and results of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible fugitive emissions are present (if observed), any corrective action taken in response to the visible fugitive emissions, and the date corrective action was taken.

[12/22/2021]

## **2.8 Relocation Demonstration Recordkeeping**

To demonstrate compliance with the relocation requirement the permittee shall record the date and location each time the concrete batch plant is relocated to a different aggregate pit or storage area.

[12/22/2021]

## **2.9 Odor Complaints**

The permittee shall maintain records of all odor complaints received to demonstrate compliance with the Odors permit condition. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[12/22/2021]

## **2.10 Recordkeeping**

All monitoring and recordkeeping documentation required by this permit shall be maintained in accordance with the Recordkeeping general provision.

[12/22/2021]



# 3 Portable Concrete Batch Plant

## Emission Limits

### 3.1 Emission Limits

Emissions of particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>) 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 following table.

**Table 3.1 Concrete Batch Plant Emission Limits<sup>(a)</sup>**

Source Description	PM <sub>2.5</sub> /PM <sub>10</sub> <sup>(b)</sup>	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
Cement Silo Baghouse	0.25	1.09
Cement-weight-batch baghouse	0.15	0.66
Total baghouse emissions	0.40	1.75

- a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal two point five (2.5) and ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d) Tons per any consecutive 12-calendar month period.

[12/22/2021]

### 3.2 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 IDAPA 58.01.01.625.

## Operating Requirements

### 3.3 Maximum Concrete Production Rate

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

### 3.4 Plant Reconfiguration

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

## Monitoring Requirements

### 3.5 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.

**3.6 Baghouse Maintenance and Operation**

The permittee shall maintain and operate each baghouse according to manufacturer specifications and recommendations to ensure compliance with Baghouse Stack Emission Limits.

[12/22/2021]

**3.7 Recordkeeping**

All monitoring and recordkeeping documentation required by this permit shall be maintained in accordance with the Recordkeeping general provision.

[12/22/2021]

## 4 General Provisions

### General Compliance

4.1 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.]

4.2 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, 5/1/1994]

4.3 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, 5/1/1994]

### Inspection and Entry

4.4 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

4.5 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, 5/1/1994]

4.6 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; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/1994]

- 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.

[IDAPA 58.01.01.211.03, 5/1/1994]

## Performance Testing

- 4.7 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.
- 4.8 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.
- 4.9 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 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, 4/5/2000 and 4/11/2015]

## Monitoring and Recordkeeping

- 4.10 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, 5/1/1994]

## Excess Emissions

- 4.11 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, 4/5/2000]

## **Certification**

- 4.12 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, 5/1/1994]

## **False Statements**

- 4.13 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, 3/23/1998]

## **Tampering**

- 4.14 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, 3/23/1998]

## **Transferability**

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

[IDAPA 58.01.01.209.06, 4/11/2006]

## **Severability**

- 4.16 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, 5/1/1994]