



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Curt Fransen, Director

April 3, 2014

Patrick Clark
Staker Parson Companies, Idaho Concrete
P.O. Box 3429
Ogden, UT 84409

RE: Facility ID No. 777-00151, Idaho Concrete, Eagle Portable RMC, Eagle
Final Tier II Operating Permit Letter

Dear Mr. Clark:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit No. T2-2013.0049 to Staker Parson Companies for the Idaho Concrete Company facility located at Eagle, in accordance with IDAPA 58.01.01.400 through 406, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed Tier II operating permit is based on the information contained in your permit application and on the relevant comments received during the public comment period. This Tier II permit is effective immediately and replaces your previous permit, T2-2008.0071, issued on August 5, 2008. This permit does not release the Idaho Concrete Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. Please note that this permit expires five years after the issuance date.

In accordance with IDAPA 58.01.01.407, DEQ has assessed the emissions for this permit and determined that a Tier II processing fee of \$10,000 will be due. A fee invoice will be sent to you from the DEQ fiscal office shortly. Failure to submit a Tier II operating permit processing fee within 45 days of receipt of the fee invoice will result in a monthly accrual of interest in the amount of 12% per annum on the outstanding balance until the fee is paid in full.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Thomas Krinke, Air Quality Science Officer, DEQ Boise Regional Office, at 208-373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends 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.

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 Bill Rogers at 208-373-0502 or william.rogers@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". The signature is written in a cursive style with a large, stylized initial "M".

Mike Simon
Stationary Source Manager
Air Quality Division

MS/KH Permit No. T2-2013.0046 PROJ 61256

Enclosure

AIR QUALITY

TIER II OPERATING PERMIT

Permittee Staker & Parson dba Idaho Concrete 00151 (Eagle Portable RMC)
Permit Number T2 - 2013.0049
Project ID 61256
Facility ID 777-00151 (Portable)
Facility Location P.O. Box 789, 2755 E. State St.
Eagle, ID 83616

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), (IDAPA 58.01.01.400-410); (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; (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 April 3, 2014

Date Expires April 3, 2019


Ken Hanna, Permit Writer


Mike Simon, Stationary Source Manager

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1. Permit Scope

Purpose

- 1.1 This permit is a Tier II operating permit renewal. The purpose of this permit is to limit PM₁₀ emissions from this facility as part of the Northern Ada County PM₁₀ Maintenance Plan as included in the State Implementation Plan (SIP).
- 1.2 This Tier II operating permit supersedes the following permit:
 - Permit to Construct and Tier II Operating Permit No. T2-2008.0071, issued 8/5/2008.

Regulated Sources

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

Table 1.1. Regulated sources.

Permit Section	Source	Emissions Control
3	Cement Storage Silo	Baghouse
4	All associated fugitive emissions from the following: sand and aggregate transfers, weigh hopper loading, truck mixing, vehicle traffic, and wind erosion of stockpiles	Reasonable Control

2. Facility-Wide Conditions

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) 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 practices, where practical:
- 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.
 - 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; and
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving 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.
- 2.4 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 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 weekly 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.
- 2.5 Visible emissions are a trigger that requires the initiation of a strategy or strategies to control fugitive dust emission from associated processes of a concrete batch plant such as weigh hopper, sand and aggregate transfer, truck mixing, paved and unpaved roads, and stockpiles. Emissions from any of the associated processes and roads shall not exceed 20% opacity for a period or periods aggregating more than one minute in any 60-minute period. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Odors

- 2.6 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.7 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. 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.

Visible Emissions

- 2.8 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
- 2.9 The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. 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:
- a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b)
 - or
 - b) 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%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.
- 2.10 The permittee shall maintain records of the results of each visible emissions 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 were present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.11 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.

Open Burning

- 2.12 The permittee shall comply with the "Rules for Control of Open Burning" (IDAPA 58.01.01.600–623).

Reports and Certifications

- 2.13 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, 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. Any reporting required by this permit, with the exception of a Portable Equipment Registration and Relocation form, shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706
Phone: (208) 373-0550
Fax: (208) 373-0287

Air Stagnation Advisory Days

2.14 The permittee shall comply with the *Air Pollution Emergency Rules* in IDAPA 58.01.01.550-562.

Obligation to Comply

2.15 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

Incorporation of Federal Requirements by Reference

2.16 Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60
- National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61
- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

Monitoring and Recordkeeping

2.17 The permittee shall maintain sufficient recordkeeping to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurement; (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 measurements. 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 Department representatives upon request.

Relocation

- 2.18 At least 10 days prior to relocating any equipment covered by this permit, the permittee shall register all existing portable equipment using the Department's Portable Equipment Registration and Relocation Form (PERF) available on the Department's Website at: http://www.deq.idaho.gov/media/576773-ptc_relocation.pdf

Each PERF, along with a scaled plot plan of the relocation site, shall be mailed to the following address:

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

3. Cement Storage Silo

3.1 Process Description

The purpose for the cement storage silo is to store cement for use in the production of concrete.

3.2 Control Description

Particulate matter emissions from the pneumatic loading of cement from a delivery truck to the cement storage silo are controlled by a baghouse.

Emission Limits

3.3 Emissions Limits

Emissions of PM₁₀ from cement silo loading shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

Operating Requirements

3.4 Throughput Limits

The maximum annual production of concrete shall not exceed 500,000 cubic yards per any consecutive 12-month period.

3.5 Operations and Maintenance Manual Requirements

The permittee shall maintain an O&M manual for the cement storage silo baghouse describing the procedures that shall be followed to comply with General Provision 5.2 and the baghouse pressure drop requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.

3.6 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, a pressure drop monitoring device to measure the pressure differential across the cement storage silo baghouse.

3.7 Pressure Drop Across Air Pollution Control Device

The pressure drop across the cement storage silo baghouse shall be maintained within 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

3.8 Operating Parameters

The permittee shall monitor and record the following information:

- Pressure drop reading across the cement storage silo baghouse once each time the cement storage silo is loaded.
- Concrete production in cubic yards per month and cubic yards per year. Monthly concrete production shall be summed over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 3.4.
- These records shall be maintained in accordance with Permit Condition 2.17.

4. Appendix

Table 4.1. EMISSION LIMITS

Idaho Concrete Co.		
Emission Limits^a - Hourly (lb/hr), and annual^b (T/yr)		
Source Description	Hourly PM₁₀^c Emissions (lb/hr)	Annual PM₁₀^c Emissions (T/yr)
Cement storage silo	3.7	0.6
All associated process emissions (fugitives included)		19.4

- ^a As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.
- ^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(s), or by actual annual production rates.
- ^c Includes condensibles.

5. General Provisions

General Compliance

5.1 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.]

5.2 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, 405, 5/1/94]

5.3 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. 406, 5/1/94]

Inspection and Entry

5.4 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 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

5.5 The permittee shall furnish DEQ written notifications as follows:

- 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; 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 58.01.01.405, 5/1/94]

Performance Testing

- 5.6 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

- 5.7 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 58.01.01.405, 5/1/94]

Excess Emissions

- 5.8 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

- 5.9 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

5.10 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

5.11 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]

Expiration and Renewal

5.12 Only those permit conditions regulated in accordance of IDAPA 58.01.01.400-410 are subject to expiration. The permittee shall submit an application to DEQ for renewal of this permit at least six months before, but no earlier than 18 months before the expiration of this permit. To ensure that the term of the permit does not expire before the permit is renewed the permittee is encouraged to submit a renewal application nine months prior to the date of the expiration. The expiration of a permit will not affect the operation of a stationary source or facility during the administrative procedure period associated with the permit renewal.

[IDAPA 58.01.01.405.03, 5/1/94]

Transferability

5.13 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.404.05.

[IDAPA 58.01.01. 404.05, 4/11/06]

Severability

5.14 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. 405, 5/1/94]