



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

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

June 20, 2013

Patrick Clark, Environmental Advisor  
Jack B. Parson Companies – 029-00009  
P.O. Box 3429  
Ogden, UT 84409

RE: Facility ID No. 029-00009, Jack B. Parson Companies, Soda Springs  
Final Permit Letter

Dear Mr. Clark:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2013.0025 Project 61184 to Jack B. Parson Companies – 029-00009 located at Soda Springs for the conversion of an existing Tier II permit into a PTC for a concrete batch plant. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received April 4, 2013.

This permit is effective immediately and replaces Tier II permit No. T2-060307, issued on July 28, 2006. This permit does not release Jack B. Parson Companies – 029-00009 from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Pocatello Regional Office, 444 Hospital Way, #300, Pocatello, ID 83201, Fax (208) 236-6168.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Rick Elkins, Air Quality Analyst, at (208) 236-6160 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.

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 Darrin Pampaian at (208) 373-0502 or [darrin.pampaian@deq.idaho.gov](mailto:darrin.pampaian@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 fluid and cursive, with a prominent loop at the end.

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\drp

Permit No. P-2013.0025 PROJ 61184

Enclosures

# AIR QUALITY

## PERMIT TO CONSTRUCT

**Permittee** Jack B Parson Companies – 029-00009  
**Permit Number** P-2013.0025  
**Project ID** 61184  
**Facility ID** 029-00009  
**Facility Location** 655 E. Industrial Place  
Soda Springs, ID 83276

### 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** June 20, 2013



Darrin Pampaian, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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# 1 Permit Scope

## Purpose

- 1.1 This is a modified permit to construct (PTC) for a concrete batch plant.
- 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.
- 1.3 This PTC replaces Tier II operating permit No. T2-060307, issued on July 28, 2006.

## Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	<u>Statewide Requirements</u>	N/A
3	<u>Portable Concrete Batch Plant</u> Manufacturer: Johnson Model: ND5yrd Maximum Capacity (cy/hr): 60	<u>Cement Storage Silo Baghouse</u> Capture Efficiency: 99.9%

## 2 Statewide Requirements

### 2.1 Process Description

The permittee shall comply with the following conditions when the concrete batch plant is operated anywhere (nonattainment, attainment, or unclassifiable areas) within the state of Idaho.

### Emission Limits

#### 2.2 Opacity Limit

Emissions from any stack, or any other 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.

### Operating Requirements

#### 2.3 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 particulate matter. 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, 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, 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.

#### 2.4 Operations and Maintenance Manual Requirements

The permittee shall have developed an O&M manual for the baghouse(s), which control the PM and PM<sub>10</sub> emissions from the plant (i.e. silo and batch operations). The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouse. The manual shall contain, at a minimum, requirements for monthly inspections of the baghouse during each month of operation. The inspections shall include, but not be limited, to checking the bags for structural integrity and that they are appropriately secured in place. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

## 2.5 Fugitive Dust Control Strategies

The permittee shall immediately implement a strategy or strategies to control fugitive dust emissions whenever:

- Visible fugitive emissions are greater than 20% from any transfer point. For the purposes of this permit condition, transfer points include, but are not limited to, the following: transfer of sand and aggregate to respective weigh bins/hoppers or storage bins/hoppers; transfer of sand and aggregate from respective weigh bins/hoppers or storage bins/hoppers to a conveyor; transfer of sand and aggregate from a conveyor to the mix truck; transfer of cement from its storage silo to the mix truck.
  - Transfer point control strategies include, but are not limited to, the following: limit drop heights such that there is a homogeneous flow of material; install, operate, and maintain water spray bars to control fugitive dust emissions at transfer points on conveyors.
- Visible fugitive emissions from wind erosion on stockpiles exceeds 20% opacity for a period or periods aggregating more than one minute in any 60-minute period.
  - Stockpile wind erosion control strategies include, but are not limited to, the following: limit the height of the stockpiles; limit the disturbance of stockpiles; apply water or a chemical dust suppressant onto the surface of the stockpile.
- Visible fugitive emissions from vehicle traffic on any paved or unpaved roads within the facility boundary of the concrete batch plant exceeds 20% opacity for a period or periods aggregating more than one minute in any 60-minute period.
  - Visible fugitive emissions control strategies for vehicle traffic on paved and unpaved roads within the facility boundary include, but are not limited to, the following: limit vehicle traffic; limit vehicle speed; apply water or a chemical dust suppressant to the surface of the road; apply gravel to the surface of unpaved roads; and sweep or use water sprays to clean the surface of a paved road.

## Monitoring and Recordkeeping Requirements

### 2.6 Operating Parameters

Concrete production in cubic yards per day shall be monitored and recorded. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

### 2.7 Reasonable Control Measures

The permittee shall conduct a monthly 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 monthly 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.

## **Reporting Requirements**

### **2.8 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 DEQ website), in accordance with IDAPA 58.01.01.500, to the following address:

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

### **2.9 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 DEQ shall contain a certification by a responsible official that, in accordance with reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

### **3 Portable Concrete Batch Plant**

#### **3.1 Process Description**

The 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 on site or purchased elsewhere. Typically, three or four different mixes of gravel and one or two different sizes of sand are stockpiled for various 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 primarily, and air pollution control equipment secondarily. Electricity to operate the facility is provided by the local utility.

After all the storage bins are filled, the production process begins when sand and gravel are drop-fed into their respective weigh bins. A pre-determined amount of sand and gravel is weighed and drop-fed onto an inclined conveyor, which transfers the mixture into a concrete truck. A pre-determined amount of cement is also weighed and drop-fed through a rubber chute into the concrete truck, the rubber chute directing the cement and providing 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.

The permittee shall comply with the requirements in Permit Section 2, Statewide Requirements, and the following permit conditions when the concrete batch facility is operated in any attainment or unclassifiable areas.

#### **Operating Requirements**

##### **3.2 Facility Throughput Limits**

The production rate of the concrete batch facility shall not exceed a maximum of 1,440 cy/day.

##### **3.3 Line Power Operation Limitation**

The facility is permitted to operate on line power only.

##### **3.4 Non-attainment Area Requirement**

The permittee shall not operate in a non-attainment area.

## 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, 5/1/94]

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, 5/1/94]

### 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, 5/1/94]

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;
- 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 58.01.01.211.03, 5/1/94]

### **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 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**

- 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, 5/1/94]

### **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, 4/5/00]

### **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, 5/1/94]

### **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, 3/23/98]

### **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, 3/23/98]

### **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, 4/11/06]

### **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, 5/1/94]