



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor  
Toni Hardesty, Director

January 26, 2005

**Certified Mail No. 7000 0520 0016 0850 4462**

Kirk Burns  
Burns Concrete Inc.  
P.O. Box 1864  
Idaho Falls, ID 83403

RE: Facility ID No. 777-00347, Burns Concrete, Inc., Idaho Falls  
Final Permit Letter

Dear Mr. Burns:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-040519 for Burns Concrete Inc. in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho). This permit is effective immediately and is based on your permit application received on August 9, 2004.

This permit does not release Burns Concrete Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Idaho Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. 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 call Dan Pitman at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/SC/sd  
Enclosures

Permit No. P-040519



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

**PERMIT NO.:** P-040519  
**Facility ID No.** 777-000347  
**SIC:** 3273  
**UTM COORDINATE (km):** Portable

**1. PERMITTEE**  
Burns Concrete, Inc.

**2. PROJECT**  
Portable Concrete Batch Plant

<b>3. MAILING ADDRESS</b> P.O. Box 1864	<b>CITY</b> Idaho Falls	<b>STATE ID</b>	<b>ZIP</b> 83403
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<b>4. FACILITY CONTACT</b> Kirk Burns	<b>TITLE</b> President	<b>TELEPHONE</b> (208) 524-4000
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<b>5. RESPONSIBLE OFFICIAL</b> Kirk Burns	<b>TITLE</b> President	<b>TELEPHONE</b> (208) 524-4000
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<b>6. EXACT PLANT LOCATION</b> Portable	<b>COUNTY</b> Portable
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**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Concrete Manufacturing

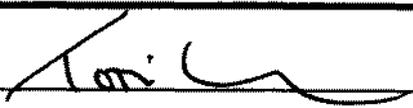
**8. GENERAL CONDITIONS**

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 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 DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

  
**TONI HARDESTY, DIRECTOR**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:** January 26, 2005

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## Acronyms, Units, and Chemical Nomenclature

cy/day	cubic yards per day
cy/yr	cubic yards per year
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
O&M	operations and maintenance
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040519**

<b>Permittee:</b>	Burns Concrete, Inc.	<b>Facility ID No.</b> 777-00347	<b>Date Issued:</b>	January 26, 2005
<b>Location:</b>	Portable			

**1. PERMIT TO CONSTRUCT SCOPE*****Purpose***

This permit to construct (PTC) is for a new concrete batch facility with a central mix drum.

***Regulated Sources***

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

**Table 1.1 REGULATED EMISSIONS SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2, 3, 4, 5	Concrete Equipment Co. (CON-E-CO), Model 454w/12s central drum mixer with maximum throughput of 450 cubic yards per hour	The emissions from weigh hopper loading and central mixer loading are controlled by the mixer baghouse
	Cement silo No.1 with storage capacity of 3,060 cubic feet.	cem 1 baghouse
	Cement silo No.2 with two identical compartments with total storage capacity of 2,940 cubic feet.	The emissions from each of the two compartments of the silo are controlled by a baghouse

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## 2. STATEWIDE REQUIREMENTS

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.

### ***Emissions Limits***

#### 2.1 **Opacity Limit**

Emissions 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 the procedures contained in IDAPA 58.01.01.625.

### ***Operating Requirements***

#### 2.2 **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, 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.
- Prompt removal of earth or other stored material from streets, where practical.

#### 2.3 **Transfer Points and Material Handling Operations Fugitive Emissions**

Burns Concrete shall use the following fugitive dust control strategies upon either observing or being notified by DEQ of one of the following triggering events:

Triggers that require initiation of a strategy or strategies to control fugitive dust emissions from transfer points, belts conveyors, bucket elevators, screening operations, conveying systems, and capture systems include but not limited to:

- Fugitive emissions observed leaving the property boundary.
- Visible emissions opacity that is greater than 20%.

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Strategies to control fugitive dust emissions for transfer points, belt conveyors, bucket elevators, screening operations, conveying systems, capture systems, and building vents include but not be limited to:

- Limit drop heights.
- Enclose the source of emissions.
- Install, operate, and maintain water supply bars to control fugitive dust emissions at transfer points, conveyor systems, bucket elevators, and screening operations as necessary.
- Other control strategy or strategies as approved by DEQ.

**2.4 Operations and Maintenance (O&M) Manual Requirements**

Within 60 days after startup, the permittee shall have developed an O&M manual for each storage silo baghouse and the mixer baghouse which describes the procedures that shall be followed to comply with General Provision 2 and the baghouse requirements contained in this permit. The manual shall contain, at a minimum, the manufacturer's specifications for pressure drop, and a maintenance schedule. The manual shall remain onsite at all times and be made available to Department of Environmental Quality (DEQ) representatives upon request. Within 60 days after startup, the permittee shall submit a copy of the O&M manual to DEQ at the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Idaho Falls Regional office  
900 Skyline, Suite B  
Idaho Falls, Idaho 83402

**2.5 Monitoring Equipment**

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to measure the pressure differential across each baghouse.

**2.6 Pressure Drop Across Baghouses**

The pressure drop across each storage silo baghouse and the mixer 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 DEQ representatives upon request.

***Monitoring and Recordkeeping Requirements***

**2.7 Operating Parameters**

The following operating parameters shall be monitored and recorded. A compilation of the most recent two years of records shall be kept onsite and made available to DEQ representatives upon request.

- Pressure drop reading across the mixer baghouse once per week during each week the concrete batch plant is operated
- Pressure drop reading across each storage silo baghouse once per month during each month when the storage silo is filled

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<b>Location:</b>	Portable	777-00347		

- The permittee shall monitor concrete production each day.
- Each month the permittee shall calculate and record the total concrete production over the most recent 12-month period in cubic yards per year

**2.8 Reasonable Control Measures**

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 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***

**2.9 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 Registration and Relocation Form (available on DEQ website at: [www.deq.state.id.us/air/permits/ptc\\_perf.pdf](http://www.deq.state.id.us/air/permits/ptc_perf.pdf)), 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

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040519**

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<b>Location:</b>	Portable			

**3. ATTAINMENT OR UNCLASSIFIABLE AREA REQUIREMENTS**

The permittee shall comply with the permit conditions under Section 2 of this permit and the following permit conditions when the concrete batch plant is operated in any attainment or unclassifiable areas within the state of Idaho.

***Operating Requirements***

**3.1 Facility Throughput Limits**

The production rate of the concrete batch plant shall not exceed a maximum of 9,600 cy/day. In addition, the production rate of the concrete batch plant shall not exceed a maximum of 1,000,000 cubic yards in any consecutive 12-months when operating in any attainment or unclassifiable area.

**3.2 Collocation**

This concrete batch plant shall not operate simultaneously with any other rock crusher, concrete batch plant, or hot mix asphalt plant.

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**4. NONATTAINMENT AREA REQUIREMENTS**

The permittee shall comply with the permit conditions under Section 2 of this permit and the following permit conditions when the concrete batch plant is operated in any PM<sub>10</sub> nonattainment area within the state of Idaho.

***Operating Requirements***

**4.1 Facility Throughput Limits**

The production rate of the concrete batch plant shall not exceed a maximum of 1,460 cy/day. In addition, the production rate of the concrete batch plant shall not exceed a maximum of 532,000 cubic yards in any consecutive 12-months when operating in any PM<sub>10</sub> nonattainment area.

**4.2 Collocation**

This concrete batch plant shall not operate simultaneously with any other rock crusher, concrete batch plant, or hot mix asphalt plant.

**4.3 Sandpoint PM<sub>10</sub> Nonattainment Area**

The permittee shall not locate the concrete batch plant in the Sandpoint PM<sub>10</sub> nonattainment area. Burns Concrete may submit an air quality permit to construct application which requests the ability to locate within the Sandpoint PM<sub>10</sub> nonattainment area.

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**5. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

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.
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 compliance 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 DEQ, in writing, of the required information for the following events within 5 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 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.

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<b>Location:</b>	Portable	777-00347		

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.

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.
8. In accordance with IDAPA 58.01.01.123, 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.