



State of Idaho  
Department of Environmental Quality  
Air Quality Division

**AIR QUALITY PERMIT  
STATEMENT OF BASIS**

**Tier II Operating Permit and Permit to Construct No. T2-2008.0071**

**Final**

**Idaho Concrete Co.**

**Portable**

**Facility ID No. 777-00151**

**August 1, 2008**

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**Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01 et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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## Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
gr	grain (1 lb = 7,000 grains)
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
gpm	gallons per minute
HAP	Hazardous Air Pollutant
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
MMBtu	million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
TAP	Toxic Air Pollutant
T2	Tier II operating permit
T2/PTC	Tier II operating permit and permit to construct
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

## STATEMENT OF BASIS

<b>Permittee:</b>	Idaho Concrete Co.	<b>Permit No.</b>	T2-2008.0071
<b>Location:</b>	Portable	<b>Facility ID No.</b>	777-00151

### 1. FACILITY INFORMATION

#### 1.1 Facility Description

Idaho Concrete Co., formerly Monroc Concrete, produces concrete by mixing cement, sand, and aggregate according to the specifications of its customers.

#### 1.2 Permitting Action and Facility Permitting History

##### *Tier II Operating Permit and Permit to Construct*

This T2/PTC is a renewal of an existing permit. The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

May 15, 1996	PTC #777-00151, Initial PTC issued. (S)
August 3, 2000	PTC #777-00151, PTC modification to allow operating in attainment and nonattainment areas. (S)
August 7, 2002	PTC #777-00151, PTC amendment to reflect change in name from Monroc to Staker & Parsons. (S)
July 8, 2003	Tier II Operating Permit No. T2-020033, Limits PM <sub>10</sub> emission in accordance with Northern Ada County Maintenance Plan.

### 2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

#### 2.1 Application Scope

The proposed action involves the renewal of the facility's current T2/PTC permit without a requested change in emission.

#### 2.2 Application Chronology

April 28, 2008	DEQ received application.
May 22, 2008	DEQ determined application complete.

### 3. TECHNICAL ANALYSIS

#### 3.1 Emission Unit and Control Device

Table 3.1 lists all sources of emissions that are regulated by this proposed permitting action.

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**Table 3.1 EMISSIONS SOURCES**

Source Description	Emissions Control
Cement storage silo	Baghouse
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

**3.2 Emissions Inventory**

The proposed action involves the renewal of the facility’s current T2/PTC permit without a requested change in emissions. Therefore, no emissions inventory was developed.

**3.3 Ambient Air Quality Impact Analysis**

The proposed action involves the renewal of the facility’s current T2/PTC permit without a requested change in emissions. Therefore, no ambient air quality impact analysis was performed.

**4. REGULATORY REVIEW**

**4.1 Attainment Designation (40 CFR 81.313)**

The facility was initially located in Ada County which is designated as attainment for, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, and SO<sub>x</sub>, and unclassifiable for NO<sub>2</sub> and Ozone. See 40 CFR 81.313 for additional information.

**4.2 Permit to Construct (IDAPA 58.01.01.201)**

The proposed action involves the renewal of the facility’s current T2/PTC permit without a requested change in emission, or modification of the permit. Therefore, the requirements of IDAPA 58.01.01.312 do not apply.

**4.3 Tier II Operating Permit (IDAPA 58.01.01.401)**

IDAPA 58.01.01.401 ..... Tier II Operating Permit.

The facility has requested renewal of its Tier II operating permit.

**4.4 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)**

IDAPA 58.01.01.312..... Duty To Apply

The facility is not a Tier I source in accordance with IDAPA 58.01.01.006.113. Therefore, the requirements of IDAPA 58.01.01.201 do not apply.

**4.5 PSD Classification (40 CFR 52.21)**

40 CFR 52.21..... Prevention of Significant Deterioration Of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source, not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52.21(b). Therefore, in accordance with 40 CFR 52.21(a)(2), the PSD requirements do not apply.

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### 4.6 NSPS Applicability (40 CFR 60)

No NSPS applies to this facility.

### 4.7 NESHAP Applicability (40 CFR 61)

No NESHAP applies to this facility.

### 4.8 MACT Applicability (40 CFR 63)

No MACT applies to this facility because it is a minor source of HAPs.

### 4.9 CAM Applicability (40 CFR 64)

40 CFR 64 does not apply to this facility because it is not required to obtain a part 70 or 71 permit.

### 4.10 Permit Conditions Review

The proposed action involves the renewal of the facility's current T2/PTC permit without a requested change in emissions or permit conditions. Permit Condition 3.5 has been revised to include the correct reference to the revised General Provisions.

## 5. PERMIT FEES

Table 5.1 lists the processing fee associated with this permitting action. The facility is subject to a processing fee of \$10,000.00, in accordance with IDAPA 58.01.01.407, because its permitted emissions are 0.6 T/yr. Refer to the chronology for fee receipt dates.

## 6. PUBLIC COMMENT

The proposed action involves the renewal of the facility's current T2/PTC permit without a requested change in emissions. In accordance with IDAPA 58.01.01.404, a public comment period is not required.

## **Appendix A – AIRS Information**

# AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM

**Permittee/Facility Name:** Idaho Concrete Co.  
**Facility Location:** Portable  
**AIRS Number:** 777-00151

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION
								A-Attainment U-Unclassified N- Nonattainment
SO <sub>2</sub>	SM	B					B	A
NO <sub>x</sub>	SM	B					B	U
CO	SM	B					B	A
PM <sub>10</sub>	SM	B					B	A
PT (Particulate)	SM	B						
VOC	SM	B					B	U
THAP (Total HAPs)								
			<b>APPLICABLE SUBPART</b>					

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).