

## **Statement of Basis**

**Tier II Operating Permit No. T2-2013.0050  
Project ID 61257**

**Staker Parson dba Idaho Concrete  
Caldwell, Idaho**

**Facility ID 777-00113**

**Final**

*CZ*

**December 3, 2013  
Carole Zundel  
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

CFR	Code of Federal Regulations
CO	Carbon Monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAP	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
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
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/Tier II	permit to construct and Tier II operating permit
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
VOC	volatile organic compounds

## FACILITY INFORMATION

### Description

Staker Parson dba Idaho Concrete, formerly Idaho Concrete Co., prior to that, Monroc Concrete, produces ready-mix concrete by mixing cement, sand, and aggregate according to the specifications of their customers.

### Permitting History

This Tier II operating permit 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 Permit status is noted as active and in effect (A) or superseded (S).

August 7, 2002	PTC #777-00113, Name change from Monroc to Idaho Concrete Co. (S)
July 8, 2003	Tier II Operating Permit No. T2-020032, Limits PM <sub>10</sub> emissions in accordance with Northern Ada County PM <sub>10</sub> Maintenance Plan. (S)
August 5, 2008	PTC/Tier II Operating Permit No. T2-2008.0069, Limits PM <sub>10</sub> emissions in accordance with Northern Ada County PM <sub>10</sub> Maintenance Plan. (Active, but will become superseded with the issuance of this permit)

### Application Scope

This Tier II is a synthetic minor operating permit. The applicant has proposed to renew the PTC/Tier II operating permit. This permit is being issued as a Tier II operating permit and not a combo because some of it is part of the original State Implementation Plan (SIP) permit.

### Application Chronology

July 30, 2013	DEQ received an application fee.
August 22, 2013	DEQ received an application.
September 13, 2013	DEQ determined that the application was complete.
October 1, 2013	DEQ made available the draft permit and statement of basis for peer and regional office review.
October 8, 2013	DEQ made available the draft permit and statement of basis for applicant review.
October 28 – November 27, 2013	DEQ provided a public comment period on the proposed action.
July 30, 2013	DEQ received the permit processing fee.

## TECHNICAL ANALYSIS

### Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Sources	Control Equipment
<u>Concrete Batch Plant:</u> Manufacturer: Vince Hagan Model: VHASS Manufacture Date: 1986 Max. production: 60 cy/hr	
<u>Cement Storage Silo</u>	<u>Cement Storage Silo Baghouse</u> Manufacturer: C&W

	Model: CP-305 PM <sub>10</sub> control efficiency: 99%  <u>Cement Supplement Baghouse</u> Manufacturer: C&W Model: CP-LPR-6 PM <sub>10</sub> control efficiency: 99%  <u>Weigh Batcher Baghouse</u> Manufacturer: C&W Model: CP-35 PM <sub>10</sub> control efficiency: 99%
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

**Emissions Inventories**

There has been no increase in emissions, so no new emissions inventory is required.

**Ambient Air Quality Impact Analyses**

The Staker Parson permit is a Tier II renewal. The Tier II permit was required because of the Treasure Valley PM<sub>10</sub> Maintenance Plan. The Tier II can be renewed without additional modeling provided the following:

1. There have been no changes at the facility since the previously-issued Tier II that would increase PM<sub>10</sub> emissions.
2. The Tier II issued is a PM<sub>10</sub>-specific Tier II and does not address other pollutants.

**REGULATORY ANALYSIS**

**Attainment Designation (40 CFR 81.313)**

The facility is currently located in Canyon County, which is designated as attainment or unclassifiable for PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

**Facility Classification**

“Synthetic Minor” classification for criteria pollutants is defined as the uncontrolled Potential to Emit for criteria pollutants are above the applicable major source thresholds and the Potential to Emit for criteria pollutants fall below the applicable major source thresholds. The facility has an uncontrolled potential to emit for PM<sub>10</sub> emissions that exceeds the major source threshold of 100 T/yr for each pollutant, and has a controlled PM<sub>10</sub> emission rate that is less than 100 tons per year. Therefore, this facility is designated as a Synthetic Minor facility.

**Permit to Construct (IDAPA 58.01.01.201)**

IDAPA 58.01.01.201 .....Permit to Construct Required

The application was submitted for a PTC/Tier II operating permit renewal (refer to the Tier II Operating Permit section). The PTC portion does not require renewal, and there are no new permit changes that require a PTC. Therefore, the procedures of IDAPA 58.01.01.200–228 are not applicable to this permitting action.

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

IDAPA 58.01.01.401 ..... Tier II Operating Permit

The application was submitted for a PTC/Tier II operating permit renewal. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.400-410. Because parts of this action are on a Tier II operating permit required by a SIP, the whole permit was processed as a Tier II.

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

IDAPA 58.01.01.301 ..... Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, and HAP or 10 tons per year for any one HAP or 25 tons per year for all HAP combined. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

**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. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is/is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

**NSPS Applicability (40 CFR 60)**

The facility is not subject to any NSPS requirements 40 CFR Part 60.

**NESHAP Applicability (40 CFR 61)**

The facility is not subject to any NESHAP requirements in 40 CFR 61.

**MACT Applicability (40 CFR 63)**

The facility is not subject to any MACT standards in 40 CFR Part 63.

**Permit Conditions Review**

No permit conditions were created or revised in this renewal permitting action.

**PUBLIC REVIEW**

**Public Comment Period**

A public comment period was made available to the public in accordance with IDAPA 58.01.01.404.02. During this time, comments were not submitted in response to DEQ's proposed action. Refer to the chronology for public comment period dates.

**APPENDIX A – PROCESSING FEE**

## Tier II Fee Calculation

**Instructions:**

Insert the following information and answer the following questions either Y or N. Insert the permitted emissions in tons per year into the table. TAPS only apply when the Tier II is being used for New Source Review.

**Company:** Staker Parson dba Idaho Concrete  
**Address:** 21250 Middleton Road  
**City:** Caldwell  
**State:** ID  
**Zip Code:** 83644  
**Facility Contact:** Patrick Clark  
**Title:** Environmental Advisor  
**AIRS No.:** 777-00113

**N** Did this permit meet the requirements of IDAPA 58.01.01.407.02 for a fee exemption Y/N?

**Y** Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

Is this a synthetic minor permit? Y/N

<b>Emissions Inventory</b>	
Pollutant	Permitted Emissions (T/yr)
NO <sub>x</sub>	0.0
PM <sub>10</sub>	20.0
PM	20.0
SO <sub>2</sub>	0.0
CO	0.0
VOC	0.0
HAPS/TAPS	
<b>Total:</b>	<b>40.0</b>
<b>Fee Due</b>	<b>\$ 500.00</b>

**Comments:**

There is no specific limit for PM. Estimated that it was the same as PM<sub>10</sub>.