

Statement of Basis

**Tier II Operating Permit No. T2-2013.0049
Project ID 61256**

**Staker & Parson dba Idaho Concrete 00151
Eagle Portable RMC
Eagle, Idaho**

Facility ID 777-00151

Proposed for Public Comment

**DRAFT XX, 2013
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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

CFR	Code of Federal Regulations
CO	carbon monoxide
dba	doing business as
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
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
PERF	Portable Equipment Relocation Form
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T2	Tier II operating permit
TAP	toxic air pollutants
VOC	volatile organic compounds
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

Staker & Parson Companies dba Idaho Concrete at the Eagle Portable RMC produces concrete by mixing cement, sand, and aggregate according to the specifications of its customers. This is a portable source.

Permitting History

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 Permit status is noted as active and in effect (A) or superseded (S).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 5, 2008	Tier II Operating Permit and Permit to Construct (T2/PTC) T2-2008.0071, limits PM ₁₀ emissions in accordance with Northern Ada County Maintenance Plan, Permit status (A, but will become S upon issuance of this permit)
July 8, 2003	Tier II Operating Permit No. T2-020033, limits PM ₁₀ emissions in accordance with Northern Ada County Maintenance Plan (S)
August 7, 2002	PTC #777-00151, PTC amendment to reflect facility name change, Permit status (S)
August 3, 2000	PTC #777-00151, PTC modification to allow operating in attainment and nonattainment areas, Permit status (S)
May 15, 1996	PTC #777-00151, Initial PTC issued, Permit status (S)

Application Scope

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

Application Chronology

July 30, 2013	DEQ received an application fee and a processing fee.
August 21, 2013	DEQ received a permit application.
September 19, 2013	DEQ determined that the application was complete.
September 26, 2013	DEQ made available the draft permit and statement of basis for peer and regional office review.
November 13, 2013	DEQ made available the draft permit and statement of basis for applicant review.
Month Day – Month Day, Year	DEQ provided a public comment period on the proposed action.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source	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

Emissions Inventories

The proposed action involves the renewal of the facility’s current Tier II operating permit without a requested change in emissions. Therefore, the existing emissions inventory remains in effect and a new one is not necessary.

Ambient Air Quality Impact Analyses

The proposed action involves the renewal of the facility’s current Tier II operating permit without a requested change in emissions. Therefore, the existing ambient air quality impact analysis remains in effect and a new analysis is not necessary.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility was initially located in Ada County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The facility classification for the existing permit is synthetic minor and it is not changed as a result of issuance of this permit.

Permit to Construct (IDAPA 58.01.01.201)

The application was submitted for a Tier II operating permit (refer to the Tier II Operating Permit section). 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 facility is not subject to IDAPA 58.01.01.300-399, and the applicant has applied for a renewal of the existing Tier II operating permit in accordance with IDAPA 58.01.01.401. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.400-410.

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

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

The facility is not a Tier I source in accordance with IDAPA 58.01.01.006.113. Therefore, the Tier I requirements under Section 300 of the Rules 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 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

This section describes the permit conditions for only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Existing Table 2.1

Table 2.1 in the existing permit was a “summary of requirements” and it is not included in the renewal permit. Tier II permits being issued at this time no longer contain this summary so it was removed to be consistent with currently issued permits.

Revised Permit Condition 2.11

Phone numbers were added to the DEQ contact information. Also, the phrase “with the exception of a Portable Equipment Registration and Relocation form” was added to the last sentence to avoid conflict with Permit Condition 2.16 that addresses relocation requirements.

Revised Permit Condition 2.16

The website information for the PERF was updated.

New Permit Condition 2.17

The standard permit condition to address interpretation issues regarding federal regulations was added to the permit. This condition is useful for reducing confusion when there is a conflict between what a permit condition says and what a federal regulation specifies.

Revised Permit Condition 3.5

The phrase “Within 60 days after startup, the permittee shall have developed an O&M manual...” was removed since this action was completed after issuance of the initial permit for this facility. This sentence was changed to now require the facility to “maintain” this plan that has already been developed.

General Provisions

The most recent version of the Tier II operating permit General Provisions was used in this permit. These are standard permit conditions that are used in all Tier II operating permits issued in the state. The General Provision for “Construction and Operation Notification” was not included in this renewal permit since there is no new construction associated with the issuance of this renewal permit.

PUBLIC REVIEW

Public Comment Period

A public comment period was made available to the public in accordance with IDAPA 58.01.01.209.01.c. During this time, comments **were/were not** submitted in response to DEQ’s proposed action. Refer to the chronology for public comment period dates.

{if comments received} A response to public comments document has been crafted by DEQ based on comments submitted during the public comment period. That document is part of the final permit package for this permitting action.

APPENDIX – DRAFT PERMIT COMMENTS

The following comments were received from **the facility** on **Month Date, Year**:

Facility Comment: **XXX**.

DEQ Response: **XXX**.