



**Air Quality Permitting
Statement of Basis**

March 3, 2008

**Permit to Construct and Tier II Operating Permit
No. T2-2007.0220**

**Holcim (US) Inc., Bliss, Idaho
Facility ID No. 047-00013**

Prepared by:

A handwritten signature in black ink, appearing to be "R. Baldwin", is written over the printed name.

**Robert Baldwin, Permit Writer
Air Quality Division**

FINAL

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
NO _x	nitrogen oxides
O ₃	ozone
PM ₁₀	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
PTC/T2	permit to construct and Tier II operating permit
PTE	Potential to Emit
Rules	Rules for the Control of Air Pollution in Idaho
SM	synthetic minor
SO ₂	sulfur dioxide
T/yr	Tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01 Sections 201 and 404.04, Rules for the Control of Air Pollution in Idaho (Rules) for Tier II operating permits and Permits to Construct.

2. FACILITY DESCRIPTION

The Holcim (US) Incorporated Bliss facility (Holcim) is a Portland cement transfer terminal. The emissions sources at the facility are all related to material handling activities: driving vehicles on unpaved roads and moving Portland cement from rail cars to storage silos and from storage silos to trucks. Baghouse filters control emissions from railcar unloading and truck loading

3. FACILITY / AREA CLASSIFICATION

Holcim is defined as a synthetic minor facility because without permit limits on the potential to emit, the PM₁₀ emissions would exceed 100 tons per year. The AIRS classification is "SM" because the potential to emit PM₁₀ is limited to less than major source levels.

The facility is located within AQCR 63 and UTM zone 11. The facility is located in Gooding County, which is designated as attainment for PM₁₀ and unclassifiable for all other criteria pollutants (CO, NO_x, SO₂, lead, and ozone).

The AIRS information provided in Appendix C defines the classification for each regulated air pollutant at Holcim. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

This project is for the renewal of the Tier II Operating Permit and Permit to Construct issued December 11, 2002 to Holcim (US) Inc.'s Portland cement transfer facility located near Bliss, Idaho. The application letter submitted by Holcim stated that no changes occurred at the facility and the processes are operating within the requirements of the permit No. T2-030404 issued on December 11, 2002.

4.1 *Application Chronology*

November 23, 2007	Received Application for Permit Renewal
December 20, 2007	Determined Application Complete

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for the Permit to Construct and Tier II operating permit. (PTC/T2).

5.1 *Equipment Listing*

This permitting action does not change the emissions units and their controls.

5.2 Emissions Inventory

This permitting action does not change the emissions inventory.

Table 5.1 EMISSION LIMITS

Holcim (US) Inc., Bliss Terminal Potential Emissions^a – Hourly(lb/hr), and Annual (T/yr)				
Source Description	Hourly PM ₁₀ ^c Emissions (lb/hr)	Annual PM ₁₀ ^c Emissions (T/yr)	Lead	
			lb/hr	T/yr
Rail unloading	0.26	1.13	2.2E-06	3.8E-06
Truck unloading	0.64	2.82	5.4E-05	6.3E-05
Travel on unpaved roads	0.13	0.55	0	0
Total	1.0	4.5	5.6E-05	6.7E-05

^aAs determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

^b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c Includes condensibles

5.3 Modeling

This permitting action does not require ambient air quality impact analysis because it is for a permit renewal with no emissions change.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC/T2 renewal.

IDAPA 58.01.01.404.04.....Permit Revision or Renewal

Renewed Tier II operating permits will be issued pursuant to procedures for issuing permit (Section 404), except that the requirements of Subsections 404.01.c, and 404.02.b through 404.02.e shall only apply if the permit revision results in an increase in allowable emission or if deemed appropriate by the Director.

In the case of this permit renewal, no public comment period is required because there are no emissions increase associated with this permit renewal.

5.5 Fee Review

The renewal of the PTC/T2 permit requires the payment of a fee. The amount of the fee is determined from the amount of emissions generated from the facility and the Tier II operating permit processing fee in IDAPA 58.01.01.407. A facility with permitted emissions of less than one ton per year generates a processing fee of \$1,250.00.

Table 5.1 Tier II Processing Fee Summary

Emissions Inventory	
Pollutant	Permitted Emissions T/yr
NO _x	0.0
SO ₂	0.0
CO	0.0
PM ₁₀	0.24
VOC	0.0
TAPS/HAPS	0.0
Total:	0.24
Fee Due	\$ 1,250.00

6. PERMIT CONDITIONS

Since the PTC/T2 renewal did not have any changes to emission units or the emissions from the facility, the changes to the permit consisted of upgrading the facility wide conditions, Permit Condition 3.4 and Permit Condition 4.4 to the current language for each of these conditions.

Permit Condition 2.13 was added to the facility-wide conditions because it updated the permit to the standard language generated by DEQ for baghouse/filters. This condition was added to the facility-wide conditions because both permitted units in Sections 3 and 4 are controlled by baghouse filters. The prior Permit Conditions 3.4 and 4.4 addressed the baghouse filters, and the verbiage addressing the operation and maintenance of the baghouse/filters was eliminated from Permit Conditions 3.4 and 4.4.

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

A draft of this permit action was sent to the Twin Falls regional office for review on February 14, 2008. No comments were received.

7.2 Facility Review of Draft Permit

A draft of this permit action was sent to the Holcim (US) Inc. for review on February 14, 2008. A response to the draft permit was received on February 26, 2008, which stated that Holcim (US) Inc. accepts the conditions as written.

7.3 Public Comment

In accordance with IDAPA 58.01.01.404.04, no public comment was provided since the permit renewal did not contain any emission unit changes and any emissions increases.

REB/hp

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APPENDIX A - AIRS INFORMATION

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: Holcim (US) Inc.
Facility Location: Bliss, Idaho
AIRS Number: 047-00013

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 ₂	B							U
NO _x	B							U
CO	B							U
PM ₁₀	SM							U
PT (Particulate)	SM							
VOC	B							U
THAP (Total HAPs)	B							U
			APPLICABLE SUBPART					

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b 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.,