



Air Quality Permitting Statement of Basis

February 9, 2007

Permit to Construct No. P-2007.0001

**Staker & Parson dba Idaho Concrete Company
Eagle, ID 83616**

Facility ID No. 777-00394

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Final

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Acronyms, Units, and Chemical Nomenclatures

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
CO	carbon monoxide
cy/hr	cubic yards per hour
DEQ	Department of Environmental Quality
HAPs	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	National Source Performance Standard
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

2. FACILITY DESCRIPTION

This facility is a portable concrete batch plant with a maximum production rate of 100 cubic yards of concrete per hour (cy/hr). The concrete batch plant was manufactured by Stephens Manufacturing Company. The components of the plant are as follows: storage bins or stockpiles for sand and gravel, storage silos for cement and cement supplement, weigh bins, conveyors, water supply, and baghouses on the flyash silos. The plant is enclosed in a building with the exception of the truck Loadout. Associated PM emissions are controlled by a rubber boot. The plant combines sand, gravel, cement, and water to produce concrete. Electrical power is provided by the local utility.

3. FACILITY / AREA CLASSIFICATION

The facility is classified as a synthetic minor facility because its potential to emit is less than major source thresholds without requiring limits on its potential to emit. The AIRS classification is "SM". The facility is not a designated facility as defined by IDAPA 58.01.01.006.26. No NSPS or NESHAP requirements apply.

The facility is a portable source.

4. APPLICATION SCOPE

This permitting action involves a change in facility name and ownership from Consolidated Concrete Company to Parson & Staker dba Idaho Concrete Company. This PTC also involves changing the facility from a stationary facility to a portable facility. This facility has previously been classified as a stationary facility. Staker & Parson dba Idaho Concrete Company has requested that this facility be reclassified as a portable plant and be allowed to operate at 100 cy/hr with the maximum annual concrete production limit of 250,000 cubic yards per year.

4.1 *Application Chronology*

December 27, 2006	Change of ownership notification and request for facility reclassification received
January 19, 2007	Application determined complete
January 19, 2007	Boise Regional Office has been notified of the facility's change in ownership and facility classification from a stationary source to a portable source
January 31, 2007	Draft permit reviewed by facility and returned with comments that have not been incorporated into the permit due to Northern Ada County SIP provisions
February 9, 2007	Final permit issued

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC action.:

5.1 *Equipment Listing*

Table 5.1 contains the equipment listing and the emissions controls.

Table 5.1 Equipment Listing and Emissions Controls

Emissions Unit(s)/Processes	Emissions Control Device	Emissions Point
Concrete Batch Plant	Baghouse	Round Stack Baghouse: Stack height: 60 feet Stack diameter: 0.88 feet Exit air flow rate: 795 acfm Control Efficiency: 99.9%
Materials Transfer: Truck Loading	Rubber Boot Enclosure	Truck Loadout Transfer Point

5.2 *Emissions Inventory*

This project does not involve an emissions increase. No emission inventory was submitted. Please refer to the emission inventory for Tier II OP No. T2-000034 that was issued December 3, 2001.

5.3 *Modeling*

The modeling for Idaho Concrete Company was directed to the only point source (storage silo baghouse). The rest of the facility's emissions are associated fugitive emissions generated by the production of concrete. Future modeling is unnecessary providing the facility configuration remains unchanged upon relocation.

5.4 *Regulatory Review*

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

IDAPA 58.01.01.209.04Procedure for Issuing Permits – Revisions of Permits to Construct

This project involves changing the name that the facility does business as due to a change in ownership. It is being processed as a permit revision. None of the permit conditions change, nor do the regulations which are applicable to the facility change.

5.5 *Permit Conditions Review*

No permit conditions are changed from the original Tier II OP No. T2-000034 issued December 3, 2001.

6. PERMIT FEES

In accordance with IDAPA 58.01.01.225 a processing fee of five-hundred dollars is required for "minimal engineering analysis."

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

Boise Regional Office has been notified of the facilities change in ownership and facility status from a stationary source to a portable source.

7.2 Facility Review of Draft Permit

Idaho Concrete Company requested that Section 2.12 of proposed PTC P-2007.0001 be changed from “each day” to “each week” in reference to the facility wide inspection of potential sources of fugitive emissions. Although the daily requirement is not a significant burden, all of the other PTC for Idaho Concrete specifies weekly inspections. Potential operator confusion will be reduced by changing this requirement to be more in line with the other permits. Due to the stipulations imposed by the Northern Ada county SIP provisions, the facility inspections must continue as “each day.”

7.3 RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that DEQ issue a Final PTC No. P-2007.0001 to Staker & Parson dba Idaho Concrete Company for its Eagle Facility.

JP/bf Permit No. P-2007.0001

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Appendix A

AIRS Information

P-2007.0001

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

Facility Name: Staker & Parson dba Idaho Concrete Company
Facility Location: Eagle, ID
AIRS Number: 777-00394

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								U
NO _x								U
CO								U
PM ₁₀	SM						SM	U
PT (Particulate)	SM							U
VOC								
THAP (Total HAPs)								
			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., radionuclides).