



State of Idaho  
Department of Environmental Quality  
Air Quality Division

**AIR QUALITY PERMIT  
STATEMENT OF BASIS**

**Permit to Construct No. P-2009.0019**

**Final**

**Staker & Parson Companies dba Idaho Sand & Gravel Company**

**Portable (Greenleaf, Idaho)**

**Facility ID No. 777-00123**

**March 3, 2009**

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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

AACC	acceptable ambient concentration for carcinogens
acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
ASTM	American Society for Testing and Materials
BMP	best management practices
CAM	Compliance Assurance Monitoring
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
EL	screening emissions level
EPA	U.S. Environmental Protection Agency
HAP	Hazardous Air Pollutants
HMA	hot mix asphalt
hr/yr	hours per consecutive 12-calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
kW	kilowatts
lb/hr	pounds per hour
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
$\text{NO}_2$	nitrogen dioxide
$\text{NO}_x$	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
$\text{PM}_{10}$	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
RAP	recycled asphalt pavement
RFO4	reprocessed fuel oil grade 4 (used oil)
Rules	Rules for the Control of Air Pollution in Idaho
SIP	State Implementation Plan
SM	synthetic minor
$\text{SO}_2$	sulfur dioxide
$\text{SO}_x$	sulfur oxides
TAP	Toxic Air Pollutants
T/yr	tons per consecutive 12-calendar month period
VOC	volatile organic compounds

## 1. FACILITY INFORMATION

### 1.1 Permitting Action and Facility Permitting History

This PTC is a transfer by revision for a name and ownership change to an existing facility, to Staker & Parson Companies (formerly the American Paving Company). 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).

April 7, 1995	Initial PTC No. P-950051 (777-00123) was issued to American Paving Company for a HMA plant using diesel fuel, baghouse control, and line power; with throughput limited to 100,000 tons per year (T/yr) of asphalt. (S)
December 21, 1999	PTC No. P-990124 (777-00123) modification was issued to American Paving Company to permit operation in both attainment and nonattainment areas, increase the throughput limit from 100,000 to 1,401,600 T/yr, and allow collocated operation and operation in nonattainment areas. (S)
March 26, 2008	PTC No. P-2007.0094 modification was issued to American Paving Company to permit used oil combustion in the drum dryer and the operation of a portable generator (except in nonattainment areas). (S)

## 2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

### 2.1 Application Scope

This PTC is a transfer by revision in accordance with IDAPA 58.01.01.209.04 and IDAPA 58.01.01.209.06.a. to change the name of an existing facility to Staker & Parson Companies (formerly the American Paving Company). The permittee contact and responsible official information have also been changed.

### 2.2 Application Chronology

July 3, 2008	DEQ received a letter requesting the name change of the facility from American Paving Company to Staker & Parson Companies.
February 27, 2009	Draft permit and statement of basis were sent for Boise Regional Office (BRO) review.
March 6, 2009	Final permit and statement of basis were issued.

## 3. TECHNICAL ANALYSIS

### 3.1 Origin of Existing Emissions Limits

Permit Conditions 3.2, 3.6, 3.7, 3.8, 3.10, 3.16, 3.17, 3.20, 3.25, 4.4, 4.5, 5.3, and 5.4 were established in PTC No. P-2007.0094 based on the modeling analysis and emissions inventory associated with the application. The emissions limits in Permit Condition 3.2 were established to protect the 24-hour and annual PM<sub>10</sub> NAAQS. The throughput limits for the drum dryer in Permit Condition 3.6, and the operating hour limits for the generator and asphalt tank heater in Permit Condition 3.7 are considered synthetic minor limits used to demonstrate compliance with the major source thresholds of PM<sub>10</sub>, CO, and NO<sub>x</sub>, and SO<sub>2</sub>. The fuel sulfur content limit in Permit Condition 3.10 is considered a synthetic minor limit used to demonstrate compliance with the major source threshold of SO<sub>2</sub>.

Permit Conditions 3.1 and 3.22 were established in PTC No. P-950051 (777-00123) and Permit Conditions 3.23, 3.24, and 3.26 were established in PTC No. P-2007.0094 to include NSPS Subpart I requirements and associated performance testing requirements, and to include the requirement for subsequent testing.

Permit Conditions 3.3, 3.4, and 3.15 were established in PTC No. P-950051 (777-00123) based on the modeling analysis and emissions inventory associated with this application.

Permit Conditions 3.5, 3.9, and 3.19, 3.21 were established in PTC No. P-2007.0094 as a result of the modification to combust used oil as a dryer fuel.

Permit Conditions 3.11, 3.13, and 3.14 were established in PTC No. P-2007.0094, and Permit Condition 3.12 was established in PTC No. P-950051 (777-00123) to insure that the facility maintains synthetic minor classification. The requirement to use a baghouse control device in Permit Condition 3.11 is considered a synthetic minor limit used to demonstrate compliance with the major source threshold of PM<sub>10</sub>.

Permit Conditions 3.18, 4.1, 4.2, 4.3, 5.1, and 5.2 were established in PTC No. P-990124 (777-00123) based on the modeling analysis and emissions inventory associated with this application.

## **4. REGULATORY REVIEW**

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

The initial location for this HMA plant is in Canyon County, which is designated as attainment or unclassifiable for PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>2</sub>, SO<sub>x</sub>, and Ozone. Reference 40 CFR 81.313.

This HMA plant is permitted for operation in nonattainment areas. Idaho currently has nonattainment areas designated for PM<sub>10</sub>. Because a separate modeling demonstration was not provided considering nonattainment operation, combustion of used oil (RFO4) and operation of the diesel-fired generator are not permitted in nonattainment areas.

Information regarding the geographical location of nonattainment areas in Idaho can be found at: [http://www.deq.idaho.gov/air/data\\_reports/monitoring/overview.cfm#AttvNon](http://www.deq.idaho.gov/air/data_reports/monitoring/overview.cfm#AttvNon)

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

The proposed modification does not meet the permit to construct exemption criteria contained in Sections 220 through 223 of the Rules. Therefore, a PTC is required.

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

The facility is classified as a synthetic minor facility because without limits on the potential to emit, the PM<sub>10</sub>, CO, NO<sub>x</sub>, and SO<sub>2</sub> emissions have the potential to exceed major source thresholds. The facility is not classified as a major facility for Tier I permitting purposes, in accordance with IDAPA 58.01.01.008.10. The facility is not a designated facility as defined in IDAPA 58.01.01.006.30.

The use of the baghouse control device, throughput limits for the drum dryer, the operating hour limits for the generator and asphalt tank heater are considered synthetic minor limits used to demonstrate compliance with the major source thresholds of PM<sub>10</sub>, CO, NO<sub>x</sub>, and SO<sub>2</sub>. In addition, the fuel sulfur content limit is considered a synthetic minor limit used to demonstrate compliance with the major source threshold of SO<sub>2</sub>.

#### **4.4 PSD Classification (40 CFR 52.21)**

The facility is classified as a synthetic minor facility, because without limits on the potential to emit, PM<sub>10</sub> emissions have the potential to exceed the PSD major source threshold.

The use of the baghouse control device is considered a synthetic minor limit to demonstrate compliance with the PSD major source threshold of PM<sub>10</sub>.

#### **4.5 NSPS Applicability (40 CFR 60)**

The facility is subject to Subpart I, Standards of Performance for Hot Mix Asphalt Facilities (refer to the Statement of Basis for PTC No. P-2007.0094 for additional information).

The diesel-fired generator is not subject to 40 CFR 60, Subpart III – Standard of Performance for stationary Compression Ignition Internal Combustion Engines. In accordance with 40 CFR 60.4200(a)(2)(i), the facility is not subject to subpart III because the permittee will operate a stationary compression ignition internal combustion engine that was ordered (commenced construction) before July 11, 2005 and was manufactured before April 1, 2006. The 800kW generator was purchased in June, 2000 and assembled in September, 2000 (Ron Spidell phone communication, 2/06/08).

#### **4.6 NESHAP Applicability (40 CFR 61)**

The facility is not subject to NESHAP.

#### **4.7 MACT Applicability (40 CFR 63)**

The facility is not subject to MACT standards.

#### **4.8 CAM Applicability (40 CFR 64)**

The facility is a synthetic minor facility for purposes of Title V, and is therefore not subject to CAM requirements. Refer to Section 4.3 for further discussion regarding the synthetic minor classification.

#### **4.9 Permit Conditions Review**

The facility name and the permittee contact information have been changed, and typographical errors have been corrected in Permit Conditions 3.2 and 3.22. No other permit conditions in this revised permit have been added, revised, modified, or deleted as a result of this permitting action.

### **5. PERMIT FEES**

No PTC application or processing fees are required, in accordance with IDAPA 58.01.01.224.03 and IDAPA 58.01.01.225.

### **6. PUBLIC COMMENT**

An opportunity for public comment period on the PTC application was not required in accordance with IDAPA 58.01.01.209.04.

## **Appendix A – AIRS Information**

## AIRS/AFS Facility-wide Classification Form

Facility Name: Staker & Parson Companies

Facility Location: Portable

Facility ID: 777-00123 Date: 2/27/09

Project/Permit No.: P-2009.0019 Completed By: Morrie Lewis

Check if there are no changes to the facilitywide classification resulting from this action. (compare to form with last permit)

Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

	SO2	PM10	VOC	
Area Classification:	U	U	U	DO NOT LEAVE ANY BLANK

Check one of the following:

**SIP [ 0 ]** - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)

OR

**Title V [ V ]** - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	SM	SM	SM	SM	SM	B	B

**PSD [ 6 ]** - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

**NSR - NAA [ 7 ]** - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

**NESHAP [ 8 ]** - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

**NSPS [ 9 ]** - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**MACT [ M ]** - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?