Statement of Basis
Concrete Batch Plant General Permit

Permit to Construct No. P-2018.0034
Project ID 62441

Champion Concrete, Inc.
Idaho Falls, Idaho

Facility ID 023-00009

Final

July 27, 2020

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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

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CBP	concrete batch plant
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HHV	higher heating value
HMA	hot mix asphalt
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
iwg	inches of water gauge
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
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
O_2	oxygen

PAH	polyaromatic hydrocarbons
PC	permit condition
PCB	polychlorinated biphenyl
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
POM	polycyclic organic matter
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
PW	process weight rate
RAP	recycled asphalt pavement
RFO	reprocessed fuel oil
RICE	reciprocating internal combustion engines
Rules	*Rules for the Control of Air Pollution in Idaho*
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO_2	sulfur dioxide
SO_X	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TEQ	toxicity equivalent
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
ULSD	ultra-low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compounds
yd^3	cubic yards
$\mu g/m^3$	micrograms per cubic meter

FACILITY INFORMATION

Description

Champion Concrete, Inc. has proposed two new stationary concrete batch plants. The main plant is a central mix and the backup plant is a truck mix. Both concrete batch plants consist of aggregate stockpiles, a cement storage silo, a cement supplement (fly ash) storage silo, a weigh batcher, and conveyors. The main facility combines aggregate, sand, fly ash, and cement and then transfers the mixture into a central drum mixer, along with water, for stationary mixing of the concrete. When using a central mix drum, concrete is transferred to trucks for transport off-site. In addition, water heaters are used to heat the water in cold weather prior to use for the mixing of concrete. The backup facility combines aggregate, sand, fly ash, and cement and then transfers the mixture into a truck mixer, along with water, for in-transit mixing of the concrete. In addition, the same water heaters for the main plant are used in the back up plant to heat the water in cold weather prior to use for the mixing of concrete. Only one concrete batch plant may operate at a time. The backup concrete batch plant is solely for operational shut down of the main concrete batch plant to ensure zero down time of production, and that the maximum annual throughput is met.

The concrete batch plant will be fed a mixture of imported pre-washed aggregates from a separate entity.

The process begins with materials being fed via front end loader to a compartment bin feeder system and then dispensed in metered proportions to a collecting conveyor. The metered material is conveyed into the central drum mixer or truck mixer for mixing and transport via mixer trucks to placement areas.

Particulate emissions will be controlled by maintaining the moisture content at 1.5% by weight for all ¼ in and smaller aggregate feed materials via water sprays. In addition, all particulate emissions from the central drum, cementitious weigh batcher, mixer and the truck mixer will be collected and vented to a high efficiency baghouse with a minimum control efficiency of 99.9% as proposed by the Applicant.

The Applicant has proposed concrete production rate throughput limits of 300 cubic yards per hour, 3,000 cubic yards per day, and 250,000 cubic yards per year.
The Applicant has proposed that line power will be used exclusively at the facility. Therefore, no IC engines powering electrical generators were included in the application.

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).

November 16, 2018	P-2018.0034, Initial Permit to Construct, Permit status (A, but will become S upon issuance of this permit)

Application Scope

This PTC is for a minor modification at an existing minor facility, to remove the seasonal restrictions on the boiler(s), and increase the facility throughput.

Application Chronology

May 4, 2020	DEQ received an application and an application and processing fee
May 6, 2020	DEQ received an application and processing fee..
May 8 – May 25, 2020	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
May 29, 2020	DEQ determined that the application was complete.
June 2, 2020	DEQ made available the draft permit and statement of basis for peer and regional office review.

July 6, 2020	DEQ made available the draft permit and statement of basis for applicant review.
July 27, 2020	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emission Point ID No.
Materials Handling	Material Transfer Points: Materials handling Concrete aggregate transfers Truck unloading of aggregate Aggregate conveyor transfers Aggregate handling	Maintaining the moisture content in ¼" or smaller aggregate material at 1.5% by weight, using water sprays, using shrouds, or other emissions controls	N/A
Concrete Mixer's	Concrete Batch Plant – Central Mix: Manufacturer: Coneco Model: 448 S Central Mix Batch Plant Manufacture Date: 2010 Max. production: 300 yd^3/hr, 3,000 yd^3/day, and 250,000 yd^3/yr Cement Storage Silo: Storage capacity: 134 cubic yards (yd^3) Bin Vent Filter/Baghouse Manufacturer[(a)]:Coneco Model: PJC 600 Fly Ash Storage Silo: Storage capacity: 134 cubic yards (yd^3) Bin Vent Filter/Baghouse Manufacturer[(a)]:Coneco Model: PJC 600 Concrete Batch Plant – Truck Mix: Manufacturer: Erie Strayer Model: MC 11-T Manufacture Date: 2018 Max. production: 150 yd^3/hr, 1,000 yd^3/day, and 20,000 yd^3/yr Cement Storage Silo: Storage capacity: 44 cubic yards (yd^3) Bin Vent Filter/Baghouse Manufacturer[a]: C & W Model: CP-10000 Fly Ash Storage Silo: Storage capacity: 44 cubic yards (yd^3) Bin Vent Filter/Baghouse Manufacturer[a]: C & W Model: CP-10000	Weigh Batcher Baghouse: Manufacturer: Coneco Model: PJ 850 $PM_{10}/PM_{2.5}$ control efficiency: 99.90% Cement Storage Silo Bin Vent Filter/Baghouse: Manufacturer: Coneco Model: PJC 600 $PM_{10}/PM_{2.5}$ control efficiency: 99.90% Fly Ash Storage Silo Bin Vent Filter/Baghouse: Manufacturer: Coneco Model: PJC 600 $PM_{10}/PM_{2.5}$ control efficiency: 99.90% Central Mix Baghouse: Manufacturer: Coneco Model: PJ 850 $PM_{10}/PM_{2.5}$ control efficiency: 99.9% Material Transfer Points: $PM_{10}/PM_{2.5}$ control efficiency: 75.0% Weigh Batcher Baghouse: Manufacturer: C & W Model: CP-10000 $PM_{10}/PM_{2.5}$ control efficiency: 99.9% Cement Storage Silo Bin Vent Filter/Baghouse: Manufacturer: C & W Model: CP-10000 $PM_{10}/PM_{2.5}$ control efficiency: 99.9% Fly Ash Storage Silo Bin Vent Filter/Baghouse: Manufacturer: C & W Model: CP-10000 $PM_{10}/PM_{2.5}$ control efficiency: 99.9% Truck Load-out: Shroud $PM_{10}/PM_{2.5}$ control efficiency: 75.0%	N/A

Source ID No.	Sources	Control Equipment	Emission Point ID No.
		Truck Mix Baghouse: Manufacturer: C & W Model: CP-10000 $PM_{10}/PM_{2.5}$ control efficiency: 99.9%	
Boiler's	Boiler: Manufacturer: Steam Engineering Model: ST 502 L Manufacture Date: 2018 Heat input rating: 5.0 MMBtu/hr Fuel: ULSD (0.0015% S by weight) Second Boiler: Manufacturer: Pearson Model: P-25-2-25W Manufacture Date: 2018 Heat input rating: 7.0 MMBtu/hr Fuel: ULSD (0.0015% S by weight)	N/A	Boiler Exhaust: Exit height: NA Exit diameter: 0.83 ft (0.25 m) Exit flow rate: 885 acfm Exit temperature: 230 °F (110 ºC) Boiler Exhaust: Exit height: 13 ft 6 in. Exit diameter: 0.83 ft (0.25 m) Exit flow rate: 915 scfm Exit temperature: 500 °F (260 ºC)

a) Both the storage silo baghouse and supplement storage silo flyash baghouse are considered process equipment and therefore there is no associated control efficiency. Controlled PM_{10} emission factors were used when determining PTE and for modeling purposes.

Emissions Inventories

Potential to Emit

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the concrete batch plant operations at the facility associated with this proposed project using the DEQ developed CBP EI spreadsheet (see Appendix A). Emissions estimates of criteria pollutant PTE were based on the following assumptions:

- Maximum concrete throughput does not exceed 300 yd^3/hour, 3,000 yd^3/day, and 250,000 yd^3/year (per the Applicant).
- Baghouse control efficiencies were assumed to be 99.9%.
- Fugitive emissions of particulate matter (PM), PM_{10}, and $PM_{2.5}$ from the concrete batch plant material transfer points were assumed to be controlled by manual water sprays, sprinklers, or spray bars, or an equivalent method that reduce PM emissions by an estimated 75%. The assumed 75% control efficiency is based on the Western Regional Air Partnership Fugitive Dust Handbook. According to the Handbook, water suppressant of material handling can range from 50-90% control. Assuming the average of 70% and including another 5% due to Best Management Practices required by the permit allow for 75% control to be a conservative estimate.
- Aggregate is washed before delivery to the concrete batch plant site, and water is used on-site to control the temperature of the aggregate. Particulate matter and PM_{10} emissions from the weigh batcher transfer point, cement storage silo, fly ash storage silo, central mix, and truck mix load-out emissions are controlled by a baghouse. Capture efficiency of the central and truck mix load-out baghouse was estimated at 99.9%.
- Controlled emissions of particulate toxic air pollutants (TAPs) were estimated based on the presence of bin vent filters/baghouse controlling emissions from the cement/cement supplement silos, a baghouse controlling emissions from the weigh batcher, and 99.9% control for central mix and truck load-out

emissions. Hexavalent chromium content was estimated at 20% of total chromium for cement, and 30% of total chromium for the cement supplement/fly ash. The hexavalent chromium percentages were taken from a University of North Dakota study, by the Energy and Environmental Research Center, Center for Air Toxic Metals. Detailed emissions calculations can be found in Appendix A of this document.

- Determining emissions from a concrete batch plant also includes transfer emissions from the number of drop points throughout the process. The PM_{10} emissions from central-mix loading operations are defined by an equation which includes the wind speed at each drop point and the moisture content of cement and cement supplement and a number of exponents and constants defined by AP-42 Equation 11.12-2 6/06). An average value of wind speed and moisture content are 7 mph, 4.17%, and 1.77%, respectively[1]. The following equation of particulate emissions is specific to PM_{10}. The resulting emissions were used to determine a factor to help evaluate wind speed variations in AERMOD modeling.

$$E = k(0.0032) * \left[\frac{U^a}{M^b} \right] + c$$

Where:
k = particle size multiplier
a = exponent
b = exponent
c = constant
U = mean wind speed
M = moisture content

- The second transfer emissions calculations were used to determine conveyor emissions. For both coarse and fine aggregate to a conveyor. It was assumed that 82%, which for this facility is 246 yd^3/hr (0.82 x 300 yd^3/hr), of the concrete produced was aggregate. This percentage was based on 1,865 lb coarse aggregate, 1,428 lb sand, 564 lb cement/supplement and 167 lb water for a total of 4,024 lb concrete as defined by AP-42 Table 11.12-5 (06/06). The fine and coarse aggregate contributions were separated into 36% and 46% of the total concrete production[2]. Employing emission factors from AP-42 Table 11.12-5 (6/06) for conveyor transfer and assuming 75% control efficiency as stated earlier for conveyor transfer PM_{10} emissions were calculated for each transfer point. For both fine and coarse aggregate the facility has 11 transfer points at the central mix station and 10 transfer points at the truck mix station.
- Emissions from the backup concrete batch plant were included in the emissions modeling analysis with the requirement that only one concrete batch plant will operate at a time.
- Any emissions unit outside a 1,000 ft radius from the concrete batch plant was not included in the emissions modeling analysis for this project.

Uncontrolled Potential to Emit

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

[1] 7 mph was the average wind speed obtained from an average of 19 Idaho airports throughout the state from 1996-2006. This data is from the Western Regional Climate Center (http://www.wrcc.dri.edu/htmlfiles/westwind.final.html#IDAHO). 4.17 % and 1.77% were the average percentages for sand and aggregate respectively. These values are based on EPA tests conducted at Cheney Enterprises. The percentages used in AP-42 are typical for most concrete batching operations.

[2] The percentages of coarse and fine aggregate are based on the AP-42 concrete composition. One cubic yard of concrete as defined by AP-42 is 4024 total pounds. Similarly, coarse aggregate is 1865 pounds or 46% of the total and sand (fine) aggregate is 1428 pounds or 36%.

The uncontrolled Potential to Emit is used to determine if a facility is a "Synthetic Minor" source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for regulated air pollutants from all emissions units at the facility as determined by DEQ staff using the DEQ Concrete Batch Plant EI spreadsheet. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this operation uncontrolled Potential to Emit is calculated with 0% control efficiency for the Concrete Batch Plant itself.

Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$	SO_2	NO_X	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources					
Concrete batch plant[a]	0.53	N/A	N/A	N/A	N/A
Steam Engineering boiler	0.37	0.02	2.26	0.56	0.06
Pearson boiler	0.52	0.03	3.16	0.79	0.09
Total, Point Sources	**1.42**	**0.05**	**5.42**	**1.35**	**0.15**

a) $PM_{10}/PM_{2.5}$ emissions from the concrete batch plant are considered "fugitive emissions" and therefore are not included in the Potential to Emit.

The following table presents the uncontrolled Potential to Emit for HAP pollutants from all emissions units at the facility as determined by DEQ staff using the DEQ Concrete Batch Plant EI spreadsheet. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this operation uncontrolled Potential to Emit is calculated with 0% control efficiency for the Concrete Batch Plant itself.

Table 3 **UNCONTROLLED POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS**

IDAPA Listing	Hazardous Air Pollutants	PTE (T/yr)
585	Ethyl Benzene	7.18E-06
	Chromium metal (II and III)	5.44E-05
	Hexane	2.03E-01
	Manganese as Mn (fume)	2.21E-04
	Phosphorous	2.33E-05
	Selenium	2.37E-04
	Toluene	7.00E-04
586	Arsenic	3.26E-05
	Benzene	9.55E-06
	Beryllium and compounds	1.92E-05
	Cadmium and compounds	2.59E-05
	Chromium (VI)	1.95E-06
	Formaldehyde	1.47E-03
	Nickel	3.16E-05
Not listed	Naphthalene(24-hour)	8.06E-02
	Mercury	4.74E-05
	Polycyclic Organic Matter (POM)	5.21E-07
	Total	**0.29**

Pre-Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

The following table presents the pre-project potential to emit for all criteria pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 4 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$		SO_2		NO_X		CO		VOC	
	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]
Concrete batch plant	0.09	0.03	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Steam Engineering boiler	0.12	0.07	7.71E-03	4.63E-03	0.71	0.43	0.18	0.11	0.02	0.01
Pearson boiler	0.17	0.10	1.08E-02	6.48E-03	1.00	0.60	0.25	0.15	0.03	0.02
Pre-Project Totals	**0.38**	**0.20**	**0.02**	**0.01**	**1.71**	**1.03**	**0.43**	**0.26**	**0.05**	**0.03**

a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

Post Project Potential to Emit

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility's classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria pollutants from all emissions units at the facility as determined by DEQ staff using the DEQ Concrete Batch Plant EI spreadsheet. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 5 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$		SO_2		NO_X		CO		VOC	
	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]	lb/hr[(a)]	T/yr[(b)]
Concrete batch plant[(c)]	0.09	0.04	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Steam Engineering boiler[(c)]	0.12	0.37	7.71E-03	2.44E-02	0.71	2.26	0.18	0.56	0.02	0.06
Pearson boiler[(c)]	0.17	0.52	1.08E-02	3.41E-02	1.00	3.16	0.25	0.79	0.03	0.09
Post Project Totals	**0.38**	**0.93**	**0.02**	**0.05**	**1.71**	**5.42**	**0.43**	**1.35**	**0.05**	**0.15**

a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.
c) Post project potential to emit is based off of the main concrete batch plant only as those emissions and throughput govern the project.

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

Table 6 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$		SO_2		NO_X		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	0.38	0.20	0.02	0.01	1.71	1.03	0.43	0.26	0.05	0.03
Post Project Potential to Emit	0.38	0.93	0.02	0.05	1.71	5.42	0.43	1.35	0.05	0.15
Changes in Potential to Emit	**0.00**	**0.73**	**0.00**	**0.04**	**0.00**	**4.39**	**0.00**	**1.09**	**0.00**	**0.12**

Non-Carcinogenic TAP Emissions

Pre- and post-project, as well as the change in, non-carcinogenic TAP emissions are presented in the following table:

Table 7 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS

Non-Carcinogenic Toxic Air Pollutants	Pre-Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Ethyl Benzene	2.27E-06	5.45E-06	3.18E-06	29	No
Chromium metal (II and III)-	5.38E-05	7.48E-05	2.10E-05	0.033	No
Hexane	3.86E-02	1.54E-01	1.15E-01	0.013	No
Manganese as Mn (fume)-	6.30E-05	1.05E-04	4.20E-05	0.067	No
Phosphorous-	1.16E-04	1.16E-04	0.00E+00	0.007	No
Selenium-	7.53E-05	1.80E-04	1.05E-04	0.013	No
Toluene	2.21E-04	5.31E-04	3.10E-04	25	No
Copper	0.00E+00	7.20E-05	7.20E-05	1.30E-02	No
Mercury	0.00E+00	3.60E-05	3.60E-05	N/A	No
Zinc	0.00E+00	4.80E-05	4.80E-05	6.67E-01	No
Naphthalene (24-hour)	0.00E+00	3.54E-02	3.54E-02	3.33	No

None of the PTEs for non-carcinogenic TAP were exceeded as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Carcinogenic TAP Emissions

Pre- and post-project, as well as the change in, carcinogenic TAP emissions are presented in the following table:

Table 8 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR CARCINOGENIC TOXIC AIR POLLUTANTS

Carcinogenic Toxic Air Pollutants	Pre-Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Post Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Change in Annual Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Arsenic-	**7.97E-06**	**4.97E-05**	**4.174E-05**	**1.5E-06**	**Yes**
Benzene	2.51E-06	1.83E-05	1.58E-05	8.0E-04	No
Beryllium and compounds-	5.01E-06	3.61E-05	3.11E-05	2.8E-05	Yes
Cadmium and compounds-	**6.24E-06**	**3.76E-05**	**3.14E-05**	**3.7E-06**	**Yes**
Chromium (VI)-	3.57E-07	4.46E-07	8.90E-08	5.6E-07	No
Formaldehyde	3.87E-04	2.83E-03	2.44E-03	5.1E-04	Yes
Nickel	7.28E-06	3.89E-05	3.16E-05	2.7E-05	Yes
Naphthalene(Annual)	4.84E-03	9.69E-05	4.74E-03	3.33	Yes
Acenaphthene	0.00E+00	1.81E-06	1.81E-06	9.10E-05	No
Acenaphthylene	0.00E+00	2.20E-08	2.20E-08	9.10E-05	No
Anthracene	0.00E+00	1.05E-07	1.05E-07	9.10E-05	No
Benzo(a)anthracene	0.00E+00	3.44E-07	3.44E-07	9.10E-05	No
Benzo(b)fluoranthene	0.00E+00	1.27E-07	1.27E-07	2.00E-06	No
Benzo(g,h,i)perylene	0.00E+00	1.94E-07	1.94E-07	9.10E-05	No
Chrysene	0.00E+00	2.04E-07	2.04E-07	2.00E-06	No
Dibenzo(a,h)anthracene	0.00E+00	1.43E-07	1.43E-07	2.00E-06	No
Fluoranthene	0.00E+00	4.15E-07	4.15E-07	9.10E-05	No
Fluorene	0.00E+00	3.83E-07	3.83E-07	9.10E-05	No
Indeno(1,2,3-cd)pyrene	0.00E+00	1.83E-07	1.83E-07	2.00E-06	No
Phenanathrene	0.00E+00	9.00E-07	9.00E-07	9.10E-05	No
Pyrene	0.00E+00	3.64E-07	3.64E-07	9.10E-05	No
PAH	0.00E+00	1.00E-06	1.00E-06	2.00E-06	No
Polycyclic Organic Matter (POM)	1.37E-07	1.00E-06	8.63E-07	2.0E-06	No

a) Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. The total is compared to benzo(a)pyrene.

Some of the PTEs for carcinogenic TAP were exceeded as a result of this project. Therefore, modeling is required for arsenic, beryllium, cadmium, nickel, formaldehyde, naphthalene because the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Post Project HAP Emissions

The following table presents the post project potential to emit for HAP pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 9 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

IDAPA Listing	Hazardous Air Pollutants	PTE (T/yr)
585	Ethyl Benzene	7.18E-06
	Chromium metal (II and III)	5.44E-05
	Hexane	2.03E-01
	Manganese as Mn (fume)	2.21E-04
	Phosphorous	2.33E-05
	Selenium	2.37E-04
	Toluene	7.00E-04
586	Arsenic	3.26E-05
	Benzene	9.55E-06
	Beryllium and compounds	1.92E-05
	Cadmium and compounds	2.59E-05
	Chromium (VI)	1.95E-06
	Formaldehyde	1.47E-03
	Nickel	3.16E-05
Not listed	Naphthalene(24-hour)	8.06E-02
	Mercury	4.74E-05
	Polycyclic Organic Matter (POM)	5.21E-07
	Total	**0.29**

The estimated PTE for all federally listed HAPs combined is below 25 T/yr and no PTE for a federally listed HAP exceeds 10 T/yr. Therefore, this facility is not a Major Source for HAPs.

Ambient Air Quality Impact Analyses

As presented in the Modeling Memo in Appendix B, the estimated emission rates of PM_{10}, $PM_{2.5}$, SO_2, NO_X, CO, VOC, HAP, and TAP from this project were below applicable screening emission levels (EL) and published DEQ modeling thresholds established in IDAPA 58.01.01.585-586 and in the State of Idaho Air Quality Modeling Guideline[3]. Refer to the Emissions Inventories section for additional information concerning the emission inventories.

The applicant has demonstrated pre-construction compliance to DEQ's satisfaction that emissions from this facility will not cause or significantly contribute to a violation of any ambient air quality standard. The applicant has also demonstrated pre-construction compliance to DEQ's satisfaction that the emissions increase due to this permitting action will not exceed any acceptable ambient concentration (AAC) or acceptable ambient concentration for carcinogens (AACC) for toxic air pollutants (TAP). A summary of the Ambient Air Impact Analysis for TAP is provided in Appendix B.

An ambient air quality impact analysis document has been crafted by DEQ based on a review of the modeling analysis submitted in the application. That document is part of the final permit package for this permitting action (see Appendix B).

As a result of the ambient air quality impact analysis, as well as information submitted by the Applicant for specific operating scenarios, the following conditions (along with corresponding monitoring and record keeping requirements) were placed in the permit:

- The Emissions Limits permit condition,
- The Concrete Production Limits permit condition,

[3] Criteria pollutant thresholds in Table 1, State of Idaho Air Quality Modeling Guideline, Doc ID AQ-011, rev. 1, December 31, 2002.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Butte County, which is designated as attainment or unclassifiable for $PM_{2.5}$, PM_{10}, SO_2, NO_2, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.

SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.

SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.

UNK = Class is unknown.

For All Other Pollutants:

A = Use when permitted emissions of a pollutant are > 100 T/yr.

SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.

SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 100 T/yr major source threshold.

UNK = Class is unknown.

Table 10 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	1.42	0.93	**100**	B
PM_{10}	1.42	0.93	**100**	B
$PM_{2.5}$	1.42	0.93	**100**	B
SO_2	0.05	0.05	**100**	B
NO_X	5.42	5.42	**100**	B
CO	1.35	1.35	**100**	B
VOC	0.15	0.15	**100**	B
HAP (single)	2.03E-01	2.03E-01	**10**	B
Total HAPs	0.29	0.29	**25**	B

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201…….. Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the modified emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401…….. Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.624……Visible Emissions

The sources of PM_{10} emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 3.4 and 4.4.

Fugitive Emissions (IDAPA 58.01.01.650)

IDAPA 58.01.01.650…….. Rules for the Control of Fugitive Emissions

The sources of fugitive emissions at this facility are subject to the State of Idaho fugitive emissions standards. These requirements are assured by Permit Conditions 2.1, 2.2, and 2.10.

Standards for New Sources (IDAPA 58.01.01.676)

IDAPA 58.01.01.676……Standards for New Sources

The fuel burning equipment located at this facility, with a maximum rated input of ten (10) million BTU per hour or more, are subject to a particulate matter limitation of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting gaseous fuels. Fuel-Burning Equipment is defined as any furnace, boiler, apparatus, stack and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer. This requirement is assured by Permit Conditions 3.13 and 4.14.

Particulate Matter – New Equipment Process Weight Limitations (IDAPA 58.01.01.701)

IDAPA 58.01.01.701……Particulate Matter – New Equipment Process Weight Limitations

IDAPA 58.01.01.700 through 703 set PM emission limits for process equipment based on when the piece of equipment commenced operation and the piece of equipment's process weight (PW) in pounds per hour (lb/hr). IDAPA 58.01.01.701 and IDAPA 58.01.01.702 establish PM emission limits for equipment that commenced operation on or after October 1, 1979 and for equipment operating prior to October 1, 1979, respectively.

For equipment that commenced operation on or after October 1, 1979, the PM allowable emission rate (E) is based on one of the following four equations:

- IDAPA 58.01.01.701.01.a: If PW is $< 9{,}250$ lb/hr; $E = 0.045\ (PW)^{0.60}$
- IDAPA 58.01.01.701.01.b: If PW is $\geq 9{,}250$ lb/hr; $E = 1.10\ (PW)^{0.25}$

For equipment that commenced prior to October 1, 1979, the PM allowable emission rate is based on one of the following equations:

- IDAPA 58.01.01.702.01.a: If PW is $< 17{,}000$ lb/hr; $E = 0.045\ (PW)^{0.60}$
- IDAPA 58.01.01.702.01.b: If PW is $\geq 17{,}000$ lb/hr; $E = 1.12\ (PW)^{0.27}$

As discussed previously in the Emissions Inventory Section, concrete has a density of 4,024 lb per cubic yard. Thus, for the new Concrete Batch Plant proposed to be installed as a result of this project with a proposed throughput of 300 y^3/hr, E is calculated as follows:

- Proposed throughput = 4,024 lb per cubic yard x 300 y^3/hr = 1,207,200 lb/hr

Therefore, E is calculated as:

- $E = 1.10 \times PW^{0.25} = 1.10 \times (1{,}207{,}200)^{0.25} = 36.46$ lb-PM/hr

As presented previously in the Emissions Inventories Section of this evaluation the post project PTE for this emissions unit is 0..38 lb-PM_{10}/hr. Assuming PM is 50% PM_{10} means that PM emissions will be 0.76 lb-PM/hr (0.38 lb-PM_{10}/hr ÷ 0.5 lb-PM_{10}/lb-PM). Therefore, compliance with this requirement has been demonstrated.

Rules for Control of Odors (IDAPA 58.01.01.775)

IDAPA 58.01.01.750…… Rules for Control of Odors

Section 776.01 states that no person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution. These requirements are assured by Permit Conditions 2.9 and 2.13.

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 all criteria pollutants or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. 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.

GACT Applicability (40 CFR 63)

Because the facility has two boilers the following NESHAP Subpart may be applicable:

- 40 CFR 63, Subpart JJJJJJ - National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

DEQ has been delegated authority to this subpart.

Those sections that are applicable are highlighted.

40 CFR 63, Subpart JJJJJJ **National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources**

§63.11193 Am I subject to this subpart?

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

The facility owns and operates two industrial boilers.

§63.11194 What is the affected source of this subpart?

(c) An affected source is a new source if you commenced construction of the affected source after June 4, 2010, and the boiler meets the applicability criteria at the time you commence construction.

Both boilers were constructed in 2018.

§63.11196 What are my compliance dates?

(c) If you start up a new affected source after May 20, 2011, you must achieve compliance with the provisions of this subpart upon startup of your affected source.

The boilers shall be in compliance upon startup.

§63.11201 What standards must I meet?

(a) You must comply with each emission limit specified in Table 1 to this subpart that applies to your boiler.

(b) You must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 to this subpart satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement.

(c) You must comply with each operating limit specified in Table 3 to this subpart that applies to your boiler.

(d) These standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time you must comply only with Table 2 to this subpart.

Table 2 to Subpart JJJJJJ of Part 63—Work Practice Standards, Emission Reduction Measures, and Management Practices

As stated in §63.11201, you must comply with the following applicable work practice standards, emission reduction measures, and management practices:

If your boiler is in this subcategory . . .	You must meet the following . . .
5. New oil-fired boilers with heat input capacity greater than 5 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct a tune-up of the boiler biennially as specified in §63.11223.
13. New oil-fired boilers with heat input capacity of equal to or less than 5 MMBtu/hr	Conduct a tune-up of the boiler every 5 years as specified in §63.11223.
15. New coal-fired, biomass-fired, or oil-fired boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up	Conduct a tune-up of the boiler every 5 years as specified in §63.11223.

§63.11205 What are my general requirements for complying with this subpart?

(a) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(b) You must demonstrate compliance with all applicable emission limits using performance stack testing, fuel analysis, or a continuous monitoring system (CMS), including a continuous emission monitoring system (CEMS), a continuous opacity monitoring system (COMS), or a continuous parameter monitoring system (CPMS), where applicable. You may demonstrate compliance with the applicable mercury emission limit using fuel analysis if the emission rate calculated according to §63.11211(c) is less than the applicable emission limit. Otherwise, you must demonstrate compliance using stack testing.

(c) If you demonstrate compliance with any applicable emission limit through performance stack testing and subsequent compliance with operating limits (including the use of CPMS), with a CEMS, or with a COMS, you must develop a site-specific monitoring plan according to the requirements in paragraphs (c)(1) through (3) of this section for the use of any CEMS, COMS, or CPMS. This requirement also applies to you if you petition the EPA Administrator for alternative monitoring parameters under §63.8(f).

(1) For each CMS required in this section (including CEMS, COMS, or CPMS), you must develop, and submit to the Administrator for approval upon request, a site-specific monitoring plan that addresses paragraphs (c)(1)(i) through (vi) of this section. You must submit this site-specific monitoring plan, if requested, at least 60 days before your initial performance evaluation of your CMS. This requirement to develop and submit a site-specific monitoring plan does not apply to affected sources with existing CEMS or COMS operated according to the performance specifications under appendix B to part 60 of this chapter and that meet the requirements of §63.11224.

(i) Installation of the CMS sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device);

(ii) Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems; and

(iii) Performance evaluation procedures and acceptance criteria (*e.g.*, calibrations).

(iv) Ongoing operation and maintenance procedures in accordance with the general requirements of §63.8(c)(1)(ii), (c)(3), and (c)(4)(ii);

(v) Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d); and

(vi) Ongoing recordkeeping and reporting procedures in accordance with the general requirements of §63.10(c) (as applicable in Table 8 to this subpart), (e)(1), and (e)(2)(i).

(2) You must conduct a performance evaluation of each CMS in accordance with your site-specific monitoring plan.

(3) You must operate and maintain the CMS in continuous operation according to the site-specific monitoring plan.

63.11210 What are my initial compliance requirements and by what date must I conduct them?

(f) For new or reconstructed boilers that combust only ultra-low-sulfur liquid fuel as defined in §63.11237, you are not subject to the PM emission limit in Table 1 of this subpart providing you monitor and record on a monthly basis the type of fuel combusted. If you intend to burn a fuel other than ultra-low-sulfur liquid fuel or gaseous fuels as defined in §63.11237, you must conduct a performance test within 60 days of burning the new fuel.

(g) For new or reconstructed affected boilers that have applicable work practice standards or management practices, you are not required to complete an initial performance tune-up, but you are required to complete the applicable biennial or 5-year tune-up as specified in §63.11223 no later than 25 months or 61 months, respectively, after the initial startup of the new or reconstructed affected source.

§63.11211 How do I demonstrate initial compliance with the emission limits?

(a) For affected boilers that demonstrate compliance with any of the emission limits of this subpart through performance (stack) testing, your initial compliance requirements include conducting performance tests according to §63.11212 and Table 4 to this subpart, conducting a fuel analysis for each type of fuel burned in your boiler according to §63.11213 and Table 5 to this subpart, establishing operating limits according to §63.11222, Table 6 to this subpart and paragraph (b) of this section, as applicable, and conducting CMS performance evaluations according to §63.11224. For affected boilers that burn a single type of fuel, you are exempted from the compliance requirements of conducting a fuel analysis for each type of fuel burned in your boiler. For purposes of this subpart, boilers that use a supplemental fuel only for startup, unit shutdown, and transient flame stability purposes still qualify as affected boilers that burn a single type of fuel, and the supplemental fuel is not subject to the fuel analysis requirements under §63.11213 and Table 5 to this subpart.

(b) You must establish parameter operating limits according to paragraphs (b)(1) through (4) of this section.

(1) For a wet scrubber, you must establish the minimum scrubber liquid flow rate and minimum scrubber pressure drop as defined in §63.11237, as your operating limits during the three-run performance stack test. If you use a wet scrubber and you conduct separate performance stack tests for PM and mercury emissions, you must establish one set of minimum scrubber liquid flow rate and pressure drop operating limits. If you conduct multiple performance stack tests, you must set the minimum scrubber liquid flow rate and pressure drop operating limits at the highest minimum values established during the performance stack tests.

(2) For an electrostatic precipitator operated with a wet scrubber, you must establish the minimum total secondary electric power (secondary voltage and secondary current), as defined in §63.11237, as your operating limits during the three-run performance stack test.

(3) For activated carbon injection, you must establish the minimum activated carbon injection rate, as defined in §63.11237, as your operating limit during the three-run performance stack test.

(4) The operating limit for boilers with fabric filters that demonstrate continuous compliance through bag leak detection systems is that a bag leak detection system be installed according to the requirements in §63.11224, and that each fabric filter must be operated such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month period.

(c) If you elect to demonstrate compliance with an applicable mercury emission limit through fuel analysis, you must conduct fuel analyses according to §63.11213 and Table 5 to this subpart and follow the procedures in paragraphs (c)(1) through (3) of this section.

(1) If you burn more than one fuel type, you must determine the fuel type, or mixture, you could burn in your boiler that would result in the maximum emission rates of mercury.

(2) You must determine the 90th percentile confidence level fuel mercury concentration of the composite samples analyzed for each fuel type using Equation 1 of this section.

P_{90} = mean + (SD * t) (Eq. 1)

Where:

P_{90} = 90th percentile confidence level mercury concentration, in pounds per million Btu.

mean = Arithmetic average of the fuel mercury concentration in the fuel samples analyzed according to §63.11213, in units of pounds per million Btu.

SD = Standard deviation of the mercury concentration in the fuel samples analyzed according to §63.11213, in units of pounds per million Btu.

t = t distribution critical value for 90th percentile (0.1) probability for the appropriate degrees of freedom (number of samples minus one) as obtained from a Distribution Critical Value Table.

(3) To demonstrate compliance with the applicable mercury emission limit, the emission rate that you calculate for your boiler using Equation 1 of this section must be less than the applicable mercury emission limit.

§63.11212 What stack tests and procedures must I use for the performance tests?

(a) You must conduct all performance tests according to §63.7(c), (d), (f), and (h). You must also develop a site-specific test plan according to the requirements in §63.7(c).

(b) You must conduct each stack test according to the requirements in Table 4 to this subpart. Boilers that use a CEMS for carbon monoxide (CO) are exempt from the initial CO performance testing in Table 4 to this subpart and the oxygen concentration operating limit requirement specified in Table 3 to this subpart.

(c) You must conduct performance stack tests at the representative operating load conditions while burning the type of fuel or mixture of fuels that have the highest emissions potential for each regulated pollutant, and you must demonstrate initial compliance and establish your operating limits based on these performance stack tests. For subcategories with more than one emission limit, these requirements could result in the need to conduct more than one performance stack test. Following each performance stack test and until the next performance stack test, you must comply with the operating limit for operating load conditions specified in Table 3 to this subpart.

(d) You must conduct a minimum of three separate test runs for each performance stack test required in this section, as specified in §63.7(e)(3) and in accordance with the provisions in Table 4 to this subpart.

(e) To determine compliance with the emission limits, you must use the F-Factor methodology and equations in sections 12.2 and 12.3 of EPA Method 19 of appendix A-7 to part 60 of this chapter to convert the measured PM concentrations and the measured mercury concentrations that result from the performance test to pounds per million Btu heat input emission rates.

§63.11213 What fuel analyses and procedures must I use for the performance tests?

(a) You must conduct fuel analyses according to the procedures in paragraphs (b) and (c) of this section and Table 5 to this subpart, as applicable. You are not required to conduct fuel analyses for fuels used for only startup, unit shutdown, and transient flame stability purposes. You are required to conduct fuel analyses only for fuels and units that are subject to emission limits for mercury in Table 1 of this subpart.

(b) At a minimum, you must obtain three composite fuel samples for each fuel type according to the procedures in Table 5 to this subpart. Each composite sample must consist of a minimum of three samples collected at approximately equal intervals during a test run period.

(c) Determine the concentration of mercury in the fuel in units of pounds per million Btu of each composite sample for each fuel type according to the procedures in Table 5 to this subpart.

§63.11214 How do I demonstrate initial compliance with the work practice standard, emission reduction measures, and management practice?

(a) If you own or operate an existing or new coal-fired boiler with a heat input capacity of less than 10 million Btu per hour, you must conduct a performance tune-up according to §63.11210(c) or (g), as applicable, and §63.11223(b). If you own or operate an existing coal-fired boiler with a heat input capacity of less than 10 million Btu per hour, you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted an initial tune-up of the boiler.

(b) If you own or operate an existing or new biomass-fired boiler or an existing or new oil-fired boiler, you must conduct a performance tune-up according to §63.11210(c) or (g), as applicable, and §63.11223(b). If you own or operate an existing biomass-fired boiler or existing oil-fired boiler, you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted an initial tune-up of the boiler.

(c) If you own or operate an existing affected boiler with a heat input capacity of 10 million Btu per hour or greater, you must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 to this subpart and that the assessment is an accurate depiction of your facility at the time of the assessment or that the maximum number of on-site technical hours specified in the definition of energy assessment applicable to the facility has been expended.

(d) If you own or operate a boiler subject to emission limits in Table 1 of this subpart, you must minimize the boiler's startup and shutdown periods following the manufacturer's recommended procedures, if available. If manufacturer's recommended procedures are not available, you must follow recommended procedures for a unit of similar design for which manufacturer's recommended procedures are available. You must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available.

§63.11220 When must I conduct subsequent performance tests or fuel analyses?

(a) If your boiler has a heat input capacity of 10 million Btu per hour or greater, you must conduct all applicable performance (stack) tests according to §63.11212 on a triennial basis, except as specified in paragraphs (b) through (e) of this section. Triennial performance tests must be completed no more than 37 months after the previous performance test.

(b) For new or reconstructed boilers that commenced construction or reconstruction on or before September 14, 2016, when demonstrating initial compliance with the PM emission limit, if your boiler's performance test results show that your PM emissions are equal to or less than half of the PM emission limit, you do not need to conduct further performance tests for PM until September 14, 2021, but must continue to comply with all applicable operating limits and monitoring requirements and must comply with the provisions as specified in paragraphs (b)(1) through (4) of this section.

(1) A performance test for PM must be conducted by September 14, 2021.

(2) If your performance test results show that your PM emissions are equal to or less than half of the PM emission limit, you may choose to conduct performance tests for PM every fifth year. Each such performance test must be conducted no more than 61 months after the previous performance test.

(3) If you intend to burn a new type of fuel other than ultra-low-sulfur liquid fuel or gaseous fuels as defined in §63.11237, you must conduct a performance test within 60 days of burning the new fuel type.

(4) If your performance test results show that your PM emissions are greater than half of the PM emission limit, you must conduct subsequent performance tests on a triennial basis as specified in paragraph (a) of this section.

(c) For new or reconstructed boilers that commenced construction or reconstruction after September 14, 2016, when demonstrating initial compliance with the PM emission limit, if your boiler's performance test results show that your PM emissions are equal to or less than half of the PM emission limit, you may choose to conduct performance tests for PM every fifth year, but must continue to comply with all applicable operating limits and monitoring requirements and must comply with the provisions as specified in paragraphs (c)(1) through (3) of this section.

(1) Each such performance test must be conducted no more than 61 months after the previous performance test.

(2) If you intend to burn a new type of fuel other than ultra-low-sulfur liquid fuel or gaseous fuels as defined in §63.11237, you must conduct a performance test within 60 days of burning the new fuel type.

(3) If your performance test results show that your PM emissions are greater than half of the PM emission limit, you must conduct subsequent performance tests on a triennial basis as specified in paragraph (a) of this section.

(d) If you demonstrate compliance with the mercury emission limit based on fuel analysis, you must conduct a fuel analysis according to §63.11213 for each type of fuel burned as specified in paragraphs (d)(1) through (3) of this section. If you plan to burn a new type of fuel or fuel mixture, you must conduct a fuel analysis before burning the new type of fuel or mixture in your boiler. You must recalculate the mercury emission rate using Equation 1 of §63.11211. The recalculated mercury emission rate must be less than the applicable emission limit.

(1) For existing boilers and new or reconstructed boilers that commenced construction or reconstruction on or before September 14, 2016, when demonstrating initial compliance with the mercury emission limit, if the mercury constituents in the fuel or fuel mixture are measured to be equal to or less than half of the mercury emission limit, you do not need to conduct further fuel analysis sampling until September 14, 2017, but must continue to comply with all applicable operating limits and monitoring requirements and must comply with the provisions as specified in paragraphs (d)(1)(i) and (ii) of this section.

(i) Fuel analysis sampling for mercury must be conducted by September 14, 2017.

(ii) If your fuel analysis results show that the mercury constituents in the fuel or fuel mixture are equal to or less than half of the mercury emission limit, you may choose to conduct fuel analysis sampling for mercury every 12 months.

(2) For new or reconstructed boilers that commenced construction or reconstruction after September 14, 2016, when demonstrating initial compliance with the mercury emission limit, if the mercury constituents in the fuel or fuel mixture are measured to be equal to or less than half of the mercury emission limit, you may choose to conduct fuel analysis sampling for mercury every 12 months, but must continue to comply with all applicable operating limits and monitoring requirements.

(3) When demonstrating compliance with the mercury emission limit, if the mercury constituents in the fuel or fuel mixture are greater than half of the mercury emission limit, you must conduct quarterly sampling.

(e) For existing affected boilers that have not operated on solid fossil fuel, biomass, or liquid fuel since the previous compliance demonstration and more than 3 years have passed since the previous compliance demonstration, you must complete your subsequent compliance demonstration no later than 180 days after the re-start of the affected boiler on solid fossil fuel, biomass, or liquid fuel.

§63.11221 Is there a minimum amount of monitoring data I must obtain?

(a) You must monitor and collect data according to this section and the site-specific monitoring plan required by §63.11205(c).

(b) You must operate the monitoring system and collect data at all required intervals at all times the affected source is operating and compliance is required, except for periods of monitoring system malfunctions or out-of-control periods (see §63.8(c)(7) of this part), repairs associated with monitoring system malfunctions or out-of-control periods, and required monitoring system quality assurance or quality control activities including, as applicable, calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in

your site-specific monitoring plan. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. You are required to complete monitoring system repairs in response to monitoring system malfunctions or out-of-control periods and to return the monitoring system to operation as expeditiously as practicable.

(c) You may not use data collected during periods of startup and shutdown, monitoring system malfunctions or out-of-control periods, repairs associated with monitoring system malfunctions or out-of-control periods, or required monitoring system quality assurance or quality control activities in calculations used to report emissions or operating levels. Any such periods must be reported according to the requirements in §63.11225. You must use all the data collected during all other periods in assessing the operation of the control device and associated control system.

(d) Except for periods of monitoring system malfunctions or monitoring system out-of-control periods, repairs associated with monitoring system malfunctions or monitoring system out-of-control periods, and required monitoring system quality assurance or quality control activities (including, as applicable, calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in your site-specific monitoring plan), failure to collect required data is a deviation of the monitoring requirements.

§63.11222 How do I demonstrate continuous compliance with the emission limits?

(a) You must demonstrate continuous compliance with each emission limit and operating limit in Tables 1 and 3 to this subpart that applies to you according to the methods specified in Table 7 to this subpart and to paragraphs (a)(1) through (4) of this section.

(1) Following the date on which the initial compliance demonstration is completed or is required to be completed under §§63.7 and 63.11196, whichever date comes first, you must continuously monitor the operating parameters. Operation above the established maximum, below the established minimum, or outside the allowable range of the operating limits specified in paragraph (a) of this section constitutes a deviation from your operating limits established under this subpart, except during performance tests conducted to determine compliance with the emission and operating limits or to establish new operating limits. Operating limits are confirmed or reestablished during performance tests.

(2) If you have an applicable mercury or PM emission limit, you must keep records of the type and amount of all fuels burned in each boiler during the reporting period. If you have an applicable mercury emission limit, you must demonstrate that all fuel types and mixtures of fuels burned would result in lower emissions of mercury than the applicable emission limit (if you demonstrate compliance through fuel analysis), or result in lower fuel input of mercury than the maximum values calculated during the last performance stack test (if you demonstrate compliance through performance stack testing).

(3) If you have an applicable mercury emission limit and you plan to burn a new type of fuel, you must determine the mercury concentration for any new fuel type in units of pounds per million Btu, using the procedures in Equation 1 of §63.11211 based on supplier data or your own fuel analysis, and meet the requirements in paragraphs (a)(3)(i) or (ii) of this section.

(i) The recalculated mercury emission rate must be less than the applicable emission limit.

(ii) If the mercury concentration is higher than mercury fuel input during the previous performance test, then you must conduct a new performance test within 60 days of burning the new fuel type or fuel mixture according to the procedures in §63.11212 to demonstrate that the mercury emissions do not exceed the emission limit.

(4) If your unit is controlled with a fabric filter, and you demonstrate continuous compliance using a bag leak detection system, you must initiate corrective action within 1 hour of a bag leak detection system alarm and operate and maintain the fabric filter system such that the alarm does not sound more than 5 percent of the operating time during a 6-month period. You must also keep records of the date, time, and duration of each alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action taken. You must also record the percent of the operating time during each 6-month period that the alarm sounds. In calculating this operating time percentage, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm is counted as

a minimum of 1 hour. If you take longer than 1 hour to initiate corrective action, the alarm time is counted as the actual amount of time taken to initiate corrective action.

(b) You must report each instance in which you did not meet each emission limit and operating limit in Tables 1 and 3 to this subpart that apply to you. These instances are deviations from the emission limits in this subpart. These deviations must be reported according to the requirements in §63.11225.

§63.11223 How do I demonstrate continuous compliance with the work practice and management practice standards?

(a) For affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a performance tune-up according to paragraph (b) of this section and keep records as required in §63.11225 (c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.

(b) Except as specified in paragraphs (c) through (f) of this section, you must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of this section. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler.

(1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.

(2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

(3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.

(4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.

(5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

(6) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of this section.

(i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.

(ii) A description of any corrective actions taken as a part of the tune-up of the boiler.

(iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

Champion Concrete, Inc. plans to manage the use of the boilers to meet the specifications outlined in Federal Title 40, Part 63, Subpart JJJJJJ and burning ultra low sulfur diesel fuel.

§63.11224 What are my monitoring, installation, operation, and maintenance requirements?

(a) If your boiler is subject to a CO emission limit in Table 1 to this subpart, you must either install, operate, and maintain a CEMS for CO and oxygen according to the procedures in paragraphs (a)(1) through (6) of this section, or install, calibrate, operate, and maintain an oxygen analyzer system, as defined in §63.11237, according to the manufacturer's recommendations and paragraphs (a)(7) and (d) of this section, as applicable, by the compliance date specified in §63.11196. Where a certified CO CEMS is used, the CO level shall be monitored at the outlet of the boiler, after any add-on controls or flue gas recirculation system and before release to the atmosphere. Boilers that use a CO CEMS are exempt from the initial CO performance testing and oxygen concentration operating limit requirements specified in §63.11211(a) of this subpart. Oxygen monitors and oxygen trim systems must be installed to monitor oxygen in the boiler flue gas, boiler firebox, or other appropriate intermediate location.

(1) Each CO CEMS must be installed, operated, and maintained according to the applicable procedures under Performance Specification 4, 4A, or 4B at 40 CFR part 60, appendix B, and each oxygen CEMS must be installed, operated, and maintained according to Performance Specification 3 at 40 CFR part 60, appendix B. Both the CO and oxygen CEMS must also be installed, operated, and maintained according to the site-specific monitoring plan developed according to paragraph (c) of this section.

(2) You must conduct a performance evaluation of each CEMS according to the requirements in §63.8(e) and according to Performance Specifications 3 and 4, 4A, or 4B at 40 CFR part 60, appendix B.

(3) Each CEMS must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) every 15 minutes. You must have CEMS data values from a minimum of four successive cycles of operation representing each of the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CEMS calibration, quality assurance, or maintenance activities are being performed, to have a valid hour of data.

(4) The CEMS data must be reduced as specified in §63.8(g)(2).

(5) You must calculate hourly averages, corrected to 3 percent oxygen, from each hour of CO CEMS data in parts per million CO concentrations and determine the 10-day rolling average of all recorded readings, except as provided in §63.11221(c). Calculate a 10-day rolling average from all of the hourly averages collected for the 10-day operating period using Equation 2 of this section.

$$\text{10-day average} = \frac{\Sigma_{i=1}^{n} Hpvi}{n} \qquad \text{(Eq. 2)}$$

Where:

Hpvi = the hourly parameter value for hour i

n = the number of valid hourly parameter values collected over 10 boiler operating days

(6) For purposes of collecting CO data, you must operate the CO CEMS as specified in §63.11221(b). For purposes of calculating data averages, you must use all the data collected during all periods in assessing compliance, except that you must exclude certain data as specified in §63.11221(c). Periods when CO data are unavailable may constitute monitoring deviations as specified in §63.11221(d).

(7) You must operate the oxygen analyzer system at or above the minimum oxygen level that is established as the operating limit according to Table 6 to this subpart when firing the fuel or fuel mixture utilized during the most recent CO performance stack test. Operation of oxygen trim systems to meet these requirements shall not be done in a manner which compromises furnace safety.

(b) If you are using a control device to comply with the emission limits specified in Table 1 to this subpart, you must maintain each operating limit in Table 3 to this subpart that applies to your boiler as specified in Table 7 to this subpart. If you use a control device not covered in Table 3 to this subpart, or you wish to establish and monitor an alternative operating limit and alternative monitoring parameters, you must apply to the United States Environmental Protection Agency (EPA) Administrator for approval of alternative monitoring under §63.8(f).

(c) If you demonstrate compliance with any applicable emission limit through stack testing and subsequent compliance with operating limits, you must develop a site-specific monitoring plan according to the requirements

in paragraphs (c)(1) through (4) of this section. This requirement also applies to you if you petition the EPA Administrator for alternative monitoring parameters under §63.8(f).

(1) For each CMS required in this section, you must develop, and submit to the EPA Administrator for approval upon request, a site-specific monitoring plan that addresses paragraphs (c)(1)(i) through (iii) of this section. You must submit this site-specific monitoring plan (if requested) at least 60 days before your initial performance evaluation of your CMS.

(i) Installation of the CMS sampling probe or other interface at a measurement location relative to each affected unit such that the measurement is representative of control of the exhaust emissions (*e.g.*, on or downstream of the last control device).

(ii) Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems.

(iii) Performance evaluation procedures and acceptance criteria (*e.g.*, calibrations).

(2) In your site-specific monitoring plan, you must also address paragraphs (c)(2)(i) through (iii) of this section.

(i) Ongoing operation and maintenance procedures in accordance with the general requirements of §63.8(c)(1), (3), and (4)(ii).

(ii) Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d).

(iii) Ongoing recordkeeping and reporting procedures in accordance with the general requirements of §63.10(c), (e)(1), and (e)(2)(i).

(3) You must conduct a performance evaluation of each CMS in accordance with your site-specific monitoring plan.

(4) You must operate and maintain the CMS in continuous operation according to the site-specific monitoring plan.

(d) If you have an operating limit that requires the use of a CMS, you must install, operate, and maintain each CPMS according to the procedures in paragraphs (d)(1) through (4) of this section.

(1) The CPMS must complete a minimum of one cycle of operation every 15 minutes. You must have data values from a minimum of four successive cycles of operation representing each of the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CMS calibration, quality assurance, or maintenance activities are being performed, to have a valid hour of data.

(2) You must calculate hourly arithmetic averages from each hour of CPMS data in units of the operating limit and determine the 30-day rolling average of all recorded readings, except as provided in §63.11221(c). Calculate a 30-day rolling average from all of the hourly averages collected for the 30-day operating period using Equation 3 of this section.

$$\text{30-day average} = \frac{\Sigma_{i=1}^{n} Hpvi}{n} \qquad \text{(Eq. 3)}$$

Where:

Hpvi = the hourly parameter value for hour i

n = the number of valid hourly parameter values collected over 30 boiler operating days

(3) For purposes of collecting data, you must operate the CPMS as specified in §63.11221(b). For purposes of calculating data averages, you must use all the data collected during all periods in assessing compliance, except that you must exclude certain data as specified in §63.11221(c). Periods when CPMS data are unavailable may constitute monitoring deviations as specified in §63.11221(d).

(4) Record the results of each inspection, calibration, and validation check.

(e) If you have an applicable opacity operating limit under this rule, you must install, operate, certify and maintain each COMS according to the procedures in paragraphs (e)(1) through (8) of this section by the compliance date specified in §63.11196.

(1) Each COMS must be installed, operated, and maintained according to Performance Specification 1 of 40 CFR part 60, appendix B.

(2) You must conduct a performance evaluation of each COMS according to the requirements in §63.8 and according to Performance Specification 1 of 40 CFR part 60, appendix B.

(3) As specified in §63.8(c)(4)(i), each COMS must complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.

(4) The COMS data must be reduced as specified in §63.8(g)(2).

(5) You must include in your site-specific monitoring plan procedures and acceptance criteria for operating and maintaining each COMS according to the requirements in §63.8(d). At a minimum, the monitoring plan must include a daily calibration drift assessment, a quarterly performance audit, and an annual zero alignment audit of each COMS.

(6) You must operate and maintain each COMS according to the requirements in the monitoring plan and the requirements of §63.8(e). You must identify periods the COMS is out of control including any periods that the COMS fails to pass a daily calibration drift assessment, a quarterly performance audit, or an annual zero alignment audit.

(7) You must calculate and record 6-minute averages from the opacity monitoring data and determine and record the daily block average of recorded readings, except as provided in §63.11221(c).

(8) For purposes of collecting opacity data, you must operate the COMS as specified in §63.11221(b). For purposes of calculating data averages, you must use all the data collected during all periods in assessing compliance, except that you must exclude certain data as specified in §63.11221(c). Periods when COMS data are unavailable may constitute monitoring deviations as specified in §63.11221(d).

(f) If you use a fabric filter bag leak detection system to comply with the requirements of this subpart, you must install, calibrate, maintain, and continuously operate the bag leak detection system as specified in paragraphs (f)(1) through (8) of this section.

(1) You must install and operate a bag leak detection system for each exhaust stack of the fabric filter.

(2) Each bag leak detection system must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations and in accordance with EPA-454/R-98-015 (incorporated by reference, see §63.14).

(3) The bag leak detection system must be certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 10 milligrams per actual cubic meter or less.

(4) The bag leak detection system sensor must provide output of relative or absolute particulate matter loadings.

(5) The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor.

(6) The bag leak detection system must be equipped with an audible or visual alarm system that will activate automatically when an increase in relative particulate matter emissions over a preset level is detected. The alarm must be located where it is easily heard or seen by plant operating personnel.

(7) For positive pressure fabric filter systems that do not duct all compartments or cells to a common stack, a bag leak detection system must be installed in each baghouse compartment or cell.

(8) Where multiple bag leak detectors are required, the system's instrumentation and alarm may be shared among detectors.

§63.11225 What are my notification, reporting, and recordkeeping requirements?

(a) You must submit the notifications specified in paragraphs (a)(1) through (5) of this section to the administrator.

(1) You must submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of this section.

(2) An Initial Notification must be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard.

(3) If you are required to conduct a performance stack test you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance stack test is scheduled to begin.

(4) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196 unless you own or operate a new boiler subject only to a requirement to conduct a biennial or 5-year tune-up or you must conduct a performance stack test. If you own or operate a new boiler subject to a requirement to conduct a tune-up, you are not required to prepare and submit a Notification of Compliance Status for the tune-up. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official.

(i) You must submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). If you conduct any performance tests or CMS performance evaluations, you must submit that data as specified in paragraph (e) of this section. If you conduct any opacity or visible emission observations, or other monitoring procedures or methods, you must submit that data to the Administrator at the appropriate address listed in §63.13.

(ii) “This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler.”

(iii) “This facility has had an energy assessment performed according to §63.11214(c).”

(iv) For units that install bag leak detection systems: “This facility complies with the requirements in §63.11224(f).”

(v) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.”

(vi) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (*www.epa.gov/cdx*). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in §63.13.

(5) If you are using data from a previously conducted emission test to serve as documentation of conformance with the emission standards and operating limits of this subpart, you must include in the Notification of Compliance Status the date of the test and a summary of the results, not a complete test report, relative to this subpart.

(b) You must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of this section. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section. For boilers that are subject only to the energy assessment requirement and/or a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section.

(1) Company name and address.

(2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(i) "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."

(ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

(iii) "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

(3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

(4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

(c) You must maintain the records specified in paragraphs (c)(1) through (7) of this section.

(1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

(2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this section.

(i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.

(ii) For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1) of this chapter, you must keep a record which documents how the secondary material meets each of the legitimacy criteria under §241.3(d)(1). If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4) of this chapter, you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2 and each of the legitimacy criteria in §241.3(d)(1) of this chapter. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c) of this chapter, you must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per §241.4, you must keep records documenting that the material is a listed non-waste under §241.4(a).

(iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.

(iv) For each boiler subject to an emission limit in Table 1 to this subpart, you must keep records of monthly fuel use by each boiler, including the type(s) of fuel and amount(s) used. For each new oil-fired boiler that meets the requirements of §63.11210(e) or (f), you must keep records, on a monthly basis, of the type of fuel combusted.

(v) For each boiler that meets the definition of seasonal boiler, you must keep records of days of operation per year.

(vi) For each boiler that meets the definition of limited-use boiler, you must keep a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent and records of fuel use for the days the boiler is operating.

(3) For sources that demonstrate compliance through fuel analysis, a copy of all calculations and supporting documentation that were done to demonstrate compliance with the mercury emission limits. Supporting documentation should include results of any fuel analyses. You can use the results from one fuel analysis for multiple boilers provided they are all burning the same fuel type.

(4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

(6) You must keep the records of all inspection and monitoring data required by §§63.11221 and 63.11222, and the information identified in paragraphs (c)(6)(i) through (vi) of this section for each required inspection or monitoring.

(i) The date, place, and time of the monitoring event.

(ii) Person conducting the monitoring.

(iii) Technique or method used.

(iv) Operating conditions during the activity.

(v) Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that monitoring indicated proper operation.

(vi) Maintenance or corrective action taken (if applicable).

(7) If you use a bag leak detection system, you must keep the records specified in paragraphs (c)(7)(i) through (iii) of this section.

(i) Records of the bag leak detection system output.

(ii) Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings.

(iii) The date and time of all bag leak detection system alarms, and for each valid alarm, the time you initiated corrective action, the corrective action taken, and the date on which corrective action was completed.

(d) Your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years.

(e)(1) Within 60 days after the date of completing each performance test (as defined in §63.2) required by this subpart, you must submit the results of the performance tests, including any associated fuel analyses, following the procedure specified in either paragraph (e)(1)(i) or (ii) of this section.

(i) For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT Web site (*https://www3.epa.gov/ttn/chief/ert/ert__info.html*) at the time of the test, you must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (*https://cdx.epa.gov/*).) Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. If you claim that some of the performance test information being submitted is confidential business information (CBI), you must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA.

The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.

(ii) For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the test, you must submit the results of the performance test to the Administrator at the appropriate address listed in §63.13.

(2) Within 60 days after the date of completing each CEMS performance evaluation (as defined in §63.2), you must submit the results of the performance evaluation following the procedure specified in either paragraph (e)(2)(i) or (ii) of this section.

(i) For performance evaluations of continuous monitoring systems measuring relative accuracy test audit (RATA) pollutants that are supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the evaluation, you must submit the results of the performance evaluation to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) Performance evaluation data must be submitted in a file format generated through the use of the EPA's ERT or an alternate file format consistent with the XML schema listed on the EPA's ERT Web site. If you claim that some of the performance evaluation information being submitted is CBI, you must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA. The electronic storage media must be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.

(ii) For any performance evaluations of continuous monitoring systems measuring RATA pollutants that are not supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the evaluation, you must submit the results of the performance evaluation to the Administrator at the appropriate address listed in §63.13.

(f) If you intend to commence or recommence combustion of solid waste, you must provide 30 days prior notice of the date upon which you will commence or recommence combustion of solid waste. The notification must identify:

(1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will commence burning solid waste, and the date of the notice.

(2) The currently applicable subcategory under this subpart.

(3) The date on which you became subject to the currently applicable emission limits.

(4) The date upon which you will commence combusting solid waste.

(g) If you have switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within this subpart, in the boiler becoming subject to this subpart, or in the boiler switching out of this subpart due to a fuel change that results in the boiler meeting the definition of gas-fired boiler, as defined in §63.11237, or you have taken a permit limit that resulted in you becoming subject to this subpart or no longer being subject to this subpart, you must provide notice of the date upon which you switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:

(1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.

(2) The date upon which the fuel switch, physical change, or permit limit occurred.

Permit Conditions Review

This section describes the permit conditions for this modified permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action. The General Provisions have been updated with the provisions from the current template.

Permit Condition 2.9 NESHAP 40 CFR 63 JJJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial Commercial, and Institutional Boilers Area Sources.

This facility is applicable to this NESHAP because of the size of the two boilers.

Permit Condition 3.5 Concrete Production Limits

The annual throughput was increased from 200,000 to 250,000.

Permit Condition 3.12 Boiler Operation Limits

This permit condition establishes the annual operating hours for each boiler.

Permit Condition 3.17 Boiler Operation Recordkeeping

This permit condition has been changed from seasonal use to annual use

Permit Condition 4.13 Boiler Operations

This permit condition establishes the annual operating hours for each boiler.

Permit Condition 4.18 Boiler Operation Recordkeeping

This permit condition has been changed from seasonal to annual use

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

APPENDIX A – EMISSIONS INVENTORIES

Data Input Tab

Note: All blue text is meant to be edited by the processing engineer.

1 Enter the facility information in the "Facilty Information" boxes.

2 Enter the concrete production rates that were applied for.

3 Enter the daily operating hours for the facility.

4 Select "T" or "C" as the type of facility. "T" represents truck mix and "C" represents central mix
The fugitive control efficiency can either be **75%** or **95%. 0%** is used to calculate uncontrolled emissions.
75% Fugitive Control assumes typical Best Management Practices like those identified in IDAPA 58.01.01.650-651.
95% Fugitive Control assumes typical control methods such as limiting dust from traffic, enclosed aggregate piles, and covering or suppressing piles.
This amount of control also assumes that no visible emissions will occur at the property boundary.
Truck loadout control efficiency can be either **70%, 95%,** or **99%**. **0%** is used to calculate uncontrolled emissions.
75% Control Loadout assumes a boot shroud or enclosure with 70% control efficiency during truck loadout.
80% Control Loadout assumes a boot shroud and a water ring spray system.
99% Control Loadout assumes a boot shroud and a baghouse system.

5 Select the dropdown stating whether or not a water heater will be used onsite.
If the selected answer is "Yes", fill out the remainder of the section. The facility may have up to two water heaters up to a heating input rating less than 10 MMBtu
Select the appropriate fuel type for each heater and enter the rating of each unit. Remember to set all heaters not used to fuel type **"N/A"**
Enter the annual operating hours of the heaters. Note: It assumed that they will operate simultaneously.

6 Select the dropdown stating whether or not an engine will be used as an electrical power source at the facility.
If the selected answer is "Yes", enter the make, model, and the horsepower of the engine. If the engine is a "non-road" IC engine (thus not stationary), "No" shou
The EPA certification rating needs to be entered as well.
Enter a zero if there is only one engine. For example, if there is only a 1,000 bhp engine, enter "0" as the rating for the small engine.
Enter a negative one (-1) if there is only one engine. For example, if there is only a 1,000 bhp engine, enter -1 as the certification for the small engine.
The facility may have up to 2 small engines (<=600 bhp) and one large engine (>600 bhp).
Enter the number of operating hours for each engine.

7 Enter the number of transfer points at the facility; the default value is two (2).

CBP Criteria Tab

9 Daily and annual throughput is restricted to specific amounts defined in the pulldown menu.

10 Depending on the data inputs, emissions are calculated for all criteria and TAP emissions associated with the concrete batch plant.
Note that 20% Chromium VI is used for cement and 30% Cr 6+ is used for the supplement or flyash

EI-Nat Gas Water Heater Tab

11 Natural Gas Water Heater - Limited to only natural gas as a fuel source.
If two heaters are selected and both are natural gas, the rating will be additive.
If the water heater being used is not natural gas-fired the hr/day and hr/yr should both be set to zero

EI-Diesel Water Heater Tab

12 Diesel water heater - Limited to only 15 ppm sulfur content ASTM disillate fuel.
If two heaters are selected and both are diesel-fired, the rating will be additive.
If the water heater being used is not diesel-fired the hr/day and hr/yr should both be set to zero

Propane Water Heater Tab

13 Propane water heater - Limited to only propane as a fuel source
If two heaters are selected and both are propane, the rating will be additive.
If the water heater being used is not propane-fired the hr/day and hr/yr should both be set to zero

IC Engine Input Tab

14 This section reiterates the input parameters and makes a few calculations associated with the IC engine.

Large and Small IC Engine Emissions Tabs

15 This tab displays the emisions associated with the IC engines. These emissions assume worst case scenario. There is no user input here.

GHG Emissions

16 This tab displays the emisions associated with the generator. These emissions assume worst case scenario. There is no user input here.

Transfer Points Tab

17 The number of transfer points may be updated by the user and is highlighted in blue. The default assumes 2.

Final EI Tab

18 This tab provides the total emissions for the facility.

Data Input

1. Facility Information

Facility Name:	**Champion Concrete, Inc.**
Facility ID:	**023-00009**
Permit and Project No.:	**P-2018.0034 Project 62441**
Source Type:	**Stationary Concrete Batch Plant**
Manufacturer/Model:	**Coneco/448 S Central Mix Batch Plant**

2. Concrete Production Rates

Maximum Hourly Concrete Production Rate:	**300**		
Proposed Daily Concrete Production Rate:	**3,000**	cy/day	**10.00**
Proposed Maximum Annual Concrete Production Rate:	**50,000**	cy/year	hr/day

3. Daily Operating Hours

Maximum daily hours of operation for facility?	**10**

4. Concrete Batch Plant Specifications

Is the facility type a truck mix (T) or central mix (C)?	**C**
What level of PM control is used for loadout, either Truck or Central?	**99%**
What level of PM control is used for fugitive emissions?	**75%**

5. Water Heater Usage

Does this facility use a water heater?	**Yes**		
How many units?	**2**	**Heat Input Rating**	
What type of fuel, Diesel, Natural Gas or Propane for unit 1?	**Diesel**	**5**	**MMBtu/hr**
If multiple units, what type of fuel, Diesel, Natural Gas or Propane for unit 2?	**Diesel**	**7**	**MMBtu/hr**
Are you assuming continual operations throughout the year?	**No**		
Maximum annual hours of water heater operation? (If assuming continual operation, enter 8,760)	**6,320**		

6. Internal Combustion Engine(s)

Are internal combustion engines used to provide electrical power at the facility?	**No**	**Please enter 0 for all units.**
How many small engines (less than or equal to 600 bhp) are being used at the facility?	**0**	
Horsepower rating of small engine #1 (<=600 bhp)? (If non-road or no engine enter 0)	**0**	
Horsepower rating of small engine #2 (<=600 bhp)? (If non-road or no engine enter 0)	**0**	
Horsepower rating of large engine (greater than 600 bhp)? (If non-road or no engine enter 0)	**0**	

Note: If there is no small or large engine enter -1 for the certification	**Small IC Engine #1**	**Small IC Engine #2**	**Large IC Engine**
Select the EPA Certification:	**-1**	**-1**	**-1**
Not an EPA-certified IC engine: Enter "0" (zero)			
Certified Tier I, Tier 2, Tier 3, or Tier 4 IC engine: Enter 1, 2, 3, or 4			
Certified "BLUE SKY" IC engine: Enter 5			

Enter the annual operating hours for the small IC engine(s)	**0**
Enter the annual operating hours for the large IC engine	**0**

7. Transfer Points

Enter the total number of transfer points in the facility? (2 is the default)	**11**

CRITERIA POLLUTANT EMISSION INVENTORY for Portable Concrete Batch Plant

Facility Information 7/27/20 16:13

Company:	**Champion Concrete, Inc.**
Facility ID:	**023-00009**
Permit and Project No.:	**P-2018.0034 Project 62441**
Source Type:	**Stationary Concrete Batch Plant**
Manufacturer/Model:	**Conecо/448 S Central Mix Batch Plant**

Assumptions Implied or Stated in Application:

See control assumptions

Truck Mix (T) or Central Mix (C) C

Production Rates[1]

Maximum Hourly Production Rate:	**300**	cy/hr		Per manufacturer
Proposed Daily Production Rate:	**3,000**	cy/day	**10.00**	Hours of operation per day at max capacity
Proposed Maximum Annual Production Rate:	**50,000**	cy/year		
Cement Storage Silo Capacity:	4540	ft^3 of aerated cement		
Cement Storage Silo Large Compartment Capacity for cement only:	65%	of the silo capacity		
Cement Storage Silo small Compartment Capacity for cement or ash:	35%	of the silo capacity		

PM_{10} Emissions due to this PTC

Emissions Point	$PM_{2.5}$ Emission Factor[1] (lb/cy)		PM_{10} Emission Factor[2] (lb/cy)		Controlled Emission Rate $PM_{2.5}$, Max.	Controlled Emission Rate PM_{10}, Max.	Controlled Emission Rate $PM_{2.5}$, 24-hour average		Controlled Emission Rate PM_{10}, 24-hour average		Controlled Emission Rate $PM_{2.5}$, annual average		Controlled Emission Rate PM_{10}, annual average		
	Controlled	Uncontrolled	Controlled	Uncontrolled	lb/hr[3]	lb/hr[3]	lb/hr[4]	lb/day[4]	lb/hr[4]	lb/day[4]	lb/hr[5]	T/yr[5]	lb/hr[5]	T/yr[5]	**Control Assumptions:**
Aggregate delivery to ground storage		0.00096		0.0031	0.07	0.23	0.03	0.72	0.097	2.33	1.37E-03	6.00E-03	0.004	0.019	**75%** Water Sprays at Operator's Discretion
Sand delivery to ground storage		0.000225		0.0007	0.02	0.05	7.03E-03	0.17	0.022	0.53	3.21E-04	1.41E-03	0.001	0.004	**75%** Water Sprays at Operator's Discretion
Aggregate transfer to conveyor		0.00096		0.0031	0.07	0.23	0.03	0.72	0.097	2.33	1.37E-03	6.00E-03	0.004	0.019	**75%** Water Sprays at Operator's Discretion
Sand transfer to conveyor		0.000225		0.0007	0.02	0.05	7.03E-03	0.17	0.022	0.53	3.21E-04	1.41E-03	0.001	0.004	**75%** Water Sprays at Operator's Discretion
Aggregate transfer to elevated storage		0.00096		0.0031	0.07	0.23	0.03	0.72	0.097	2.33	1.37E-03	6.00E-03	0.004	0.019	**75%** Water Sprays at Operator's Discretion
Sand transfer to elevated storage		0.000225		0.0007	0.02	0.05	7.03E-03	0.17	0.022	0.53	3.21E-04	1.41E-03	0.001	0.004	**75%** Water Sprays at Operator's Discretion
Cement delivery to Silo (controlled EF)	**0.00003**		**0.0001**		9.00E-03	2.50E-02	**3.75E-03**	9.00E-02	**1.04E-02**	2.50E-01	1.71E-04	7.50E-04	4.76E-04	**2.09E-03**	**0.00%** Baghouse is process equipment, use controlled EF
Cement supplement delivery to Silo (controlled EF)	**0.000045**		**0.0002**		1.35E-02	5.36E-02	**5.63E-03**	1.35E-01	**2.24E-02**	5.36E-01	2.57E-04	1.13E-03	1.02E-03	**4.47E-03**	**0.00%** Baghouse is process equipment, use controlled EF
Weigh hopper loading (sand & aggregate batcher loading)		**0.001185**		**0.00395**	3.56E-03	1.19E-02	**1.48E-03**	3.56E-02	**4.94E-03**	1.19E-01	6.76E-05	2.96E-04	2.26E-04	**9.88E-04**	**99.0%** Sealed boot (vents back to silo) or baghouse.
Truck mix loading, Table 11.12-2, "0.310 lb/ton of cement+flyash" x ((491 lb cement + 73 lb flyash)/cy concrete)/ 2000 lb = 0.0874 lb/cy. PM2.5 was calculated as 15% of PM: "1.118 lb/ton of cement+flyash" x ((491 lb cement + 73 lb flyash)/cy concrete)*0.15/ 2000 lb = 0.0473 lb/cy		**0**		**0.00000**	0.00E+00	0.00	**0.00**	0.00	**0.00**	0.00	0.00E+00	0.00E+00	0.00	**0.00**	**99.0%** Boot, enclosure, or equivalent or baghouse or boot w/water ring
Central mix loading, Table 11.12-2, "0.156 lb/ton of cement+flyash" x ((491 lb cement + 73 lb flyash)/cy concrete)/ 2000 lb = 0.0440 lb/cy. PM2.5 was calculated as 15% of PM: "0.572 lb/ton of cement+flyash" x ((491 lb cement + 73 lb flyash)/cy concrete)*0.15/ 2000 lb = 0.0242 lb/cy		**0.0242**		**0.0440**	7.26E-02	0.13	**0.03**	0.73	**0.06**	1.32	1.38E-03	6.05E-03	0.00	**0.01**	**99.0%** Baghouse control
Point Sources Total Emissions		**2.55E-02**		**4.82E-02**	**9.87E-02**	**2.23E-01**	**4.11E-02**	**9.87E-01**	**9.27E-02**	**2.23E+00**	**4.96E-04**	**2.17E-03**	**1.72E-03**	**7.54E-03**	
Process Fugitive Emissions		0.003555		0.0114	0.27	0.86	0.11	2.67	0.36	8.56	0.01	0.02	0.02	0.07	
Facility Wide Total: Point Sources + Process Fugitives (Except for Road Dust and Windblown Dust)				0.0596		1.08	0.15	3.65	0.45	10.78			0.02	0.08	

POINT SOURCE EMISSIONS for FACILITY CLASSIFICATION[6] **Controlled EF** **at** **2,628,000 cy/yr** **T/yr** (controlled PTE @ 8,760)

Facility Classification Total PM[6]		**8.40E-03**		**1.10E+01**
Facility Classification Total PM10[6,8]		**4.21E-03**		**5.54E+00**

1 The EFs were calculated using EFs in lb/ton of material handled from Table 11.12-5, and a percentage of PM that is considered to be $PM_{2.5}$. The percentage used to establish the EFs were based on AP-42, Appendix B, Table B-2.2, Category 3. It was established that the fraction that is $PM_{2.5}$ is 15%. Note that the aggregate and sand handling are static EF's in this spreadsheet, but varies during modeling as the wind speed changes each hour.

2 The EFs were calculated using EFs in lb/ton of material handled from Table 11.12-2, typical composition per cubic yard of concrete (1865 lb aggregate, 1428 lbs sand, 491 lbs cement, 73 lbs cement supplement, and 20 gallons of water = 4024 lb/cy), and closely match Table 11.12-5 values (version 6/06) when rounded to the same number of figures. AP-42 lists the same EFs for uncontrolled and controlled emissions, so control estimates are based on the assumed control levels input on the right hand side of the table.

3 Max. hourly rate includes reductions associated with control assumptions.

4 Hourly emissions rate (24-hr average) = Max.hourly emissions rate x (hrs per day) / 24.
Daily emissions rate = max emissions rate (1-hr average) x proposed hrs/day.

5 Annual average hourly emissions rate = EF (lb/cy) x proposed annual production rate (cy/yr) / (8760 hr/yr).
Annual emissions rate = EF (lb/cy) x proposed annual production rate (cy/yr) /(2000 lb/T)

6 Controlled EFs for PM = 0.0002 (cement silo) + 0.0003 (flyash silo) +0.0079(weigh batcher)
for PM10 = 0.0001 (cement silo) + 0.0002 (flyash silo) +0.0040 (weigh batcher)

7 Emissions for Facility Classification are based on baghouses as process equipment, 24-hr day, 8760 hr/yr = 7,200 cy/day, and 2,628,000 cy/yr

8 Emissions for Facility Classification do not include truck mix loading emissions; this is typically considered a fugitive emission source for concrete batch plants.

Lead emissions

Emissions Point	Lead Emission Factor[1] (lb/ton of material loaded)		**Increase in Emissions from this PTC** Emission Rate, Max.	Emissions for Comparison with DEQ Modeling Threshold		Emission Rate, Quarterly	**Emissions for Facility Classification**	
	Controlled with fabric	Uncontrolled	lb/hr, 1-hr avg.[2]	lb/month[3]	lb/yr[4]	lb/hr qtrly avg[5]		**T/yr**
Cement delivery to silo [2]	**1.09E-08**	7.36E-07	8.03E-07	2.44E-04	1.34E-04	3.34E-07	Point Source	3.52E-06
Cement supplement delivery to Silo [3]	**5.20E-07**	ND	5.69E-06	1.73E-03	9.49E-04	2.37E-06	Point Source	2.49E-05
Truck Loadout (with 99.9% control) [8]		**0.00E+00**	0.00E+00	0.00E+00	0.00E+00	0.00E+00	Fugitive	0.00E+00
Central Mix (with !30% control)		**3.82E-07**	3.23E-07	9.83E-05	5.39E-05	1.35E-07	Fugitive	1.42E-06
Total			**6.82E-06**	**2.07E-03**	**0.001**		**Point Sources**	**2.85E-05**
DEQ Modeling Threshold				100	0.6			
Modeling Required?				No	No			

[1] The emissions factors are from AP-42, Table 11.12-8 (version 06/06)
[2] Max. hourly rate = EF x pound of cement/yd^3 of concrete x max. hourly concrete production rate/(2000 lb/T)
[3] lb/mo = EF x pound of material/yd^3 of concrete x max. daily concrete production rate x (365/12)/(2000 lb/T)
[4] T/yr = EF x pound of material/yd^3 of concrete x max. annual concrete production rate/(2000 lb/T)
[5] lb/hr, qtrly avg = lb/mo x 3 months per qtr / (8760/4)hrs per qtr

Toxic Air Pollutant (TAPs) EMISSIONS INVENTORY, Concrete Batch Plant

7/27/2020 16:13

Facility Information

Company:	Champion Concrete, Inc.
Facility ID:	023-00009
Permit No.:	P-2018.0034 Project 62441
Source Type:	Stationary Concrete Batch Plant
Manufacturer:	Coneco/448 S Central Mix Batch Plant

Emissions estimates are based on EFs in AP-42, Table 11.12-8 (version 06/06) and the following composition of one yard of concrete:

Coarse aggregate		1865 pounds
Sand		1428 pounds
Cement		491 pounds
Cement supplement		73 pounds
Water		20 gallons
Concrete		**4024 pounds**

Truck Mix Loadout Factor: **0**

Central Mix Batching Factor: **1**

DEQ EI VERIFICATION WORKSHEET Version 032007
Tip: Blue text or numbers are meant to be changed.
Black text or numbers indicates it's hard-wired or calculated.
Review these before you change them.

Concrete Production

Maximum Hourly Production Rate:	300	cy/hr	
Proposed Daily Production Rate:	3,000	cy/day	
Proposed Maximum Annual Production Rate:	50,000	cy/year	

Uncontrolled (Unlimited Production Rate)

	24 hrs/day,
7,200 cy/day	7 day/wk,
2,628,000 cy/year	52 wks/year

TAP Emission Factors from AP-42, Table 11.12-8 (Version 06/06)

Emissions Point	Arsenic EF (lb/ton of material loaded)		Beryllium EF (lb/ton of material loaded)		Cadmium EF (lb/ton of material loaded)		Chromium EF (lb/ton of material loaded)		Manganese EF (lb/ton of material loaded)		Nickel EF (lb/ton of material loaded)		Phosphorus EF (lb/ton of material loaded)		Selenium EF (lb/ton of material loaded)		Chromium VI
	Controlled with Fabric filter	Uncontrolled	Controlled with Fabric filter	Uncontrolled	Controlled with Fabric filter	Uncontrolled	Controlled with Fabric filter	Uncontrolled	Controlled with Fabric filter	Uncontrolled	Controlled with Fabric filter	Uncontrolled	Controlled with Fabric filter	Uncontrolled	Controlled with Fabric filter	Uncontrolled	**Percent of total Cr that is Cr+6**
Cement silo filling (with baghouse)	**4.24E-09**	1.68E-06	**4.86E-10**	1.79E-08	ND	2.34E-07	**2.90E-08**	2.52E-07	**1.17E-07**	2.02E-04	**4.18E-08**	1.76E-05	ND	**1.18E-05**	ND	ND	**20%**
Cement supplement silo filling (with baghouse)	**1.00E-06**	ND	**9.04E-08**	ND	**1.98E-10**	ND	**1.22E-06**	ND	**2.56E-07**	ND	**2.28E-06**	ND	**3.54E-06**	ND	**7.24E-08**	ND	**30%**
Truck loading (no boot or shroud)	0.00E+00	**0.00E+00**	0.00E+00	**0.00E+00**	0.00E+00	**0.00E+00**	0.00E+00	**0.00E+00**	0.00E+00	**0.00E+00**	0.00E+00	**0.00E+00**	0.00E+00	**0.00E+00**	0.00E+00	**0.00E+00**	**21.29%**
Central Mix Batching (NO boot or shroud)	2.96E-07	**8.38E-06**	ND	ND	7.10E-10	**1.18E-08**	1.27E-07	**1.42E-06**	3.78E-06	**6.12E-05**	2.48E-07	**3.28E-06**	1.20E-06	**2.02E-05**	ND	ND	**21.29%**

UNCONTROLLED TAP EMISSIONS **Note: Includes baghouses as process equipment.** **7,200 cy/day, and** **2,628,000 cy/yr**

Emissions Point	Arsenic		Beryllium		Cadmium		Chromium		Manganese		Nickel		Phosphorus		Selenium		Chromium VI
	lb/hr annual avg.	T/yr[4]	lb/hr annual avg.	T/yr	lb/hr annual avg.	T/yr	lb/hr 24-hr avg.	T/yr[5]	lb/hr 24-hr avg.	T/yr	lb/hr annual avg.	T/yr	lb/hr 24-hr avg.	T/yr	lb/hr 24-hr avg.	T/yr	lb/hr annual avg.
Cement silo filling (with baghouse)	3.12E-07	1.37E-06	3.58E-08	1.57E-07	1.72E-05	7.55E-05	2.14E-06	8.13E-05	8.62E-06	3.77E-05	3.08E-06	1.35E-05	8.69E-04	3.81E-03	ND	ND	4.27E-07
Cement supplement silo filling (with baghouse)	1.10E-05	4.80E-05	9.90E-07	4.34E-06	2.17E-09	9.50E-09	1.34E-05	5.85E-05	2.80E-06	1.23E-05	2.50E-05	1.09E-04	3.88E-05	1.70E-04	7.93E-07	3.47E-06	4.01E-06
Truck loading (no boot or shroud)	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Central Mix Batching (NO boot or shroud)	7.09E-04	3.11E-03	ND	ND	9.98E-07	4.37E-06	1.20E-04	5.26E-04	5.18E-03	2.27E-02	2.77E-04	1.22E-03	1.71E-03	7.49E-03	ND	ND	2.56E-05
Sources Total	**7.20E-04**	3.15E-03	**1.03E-06**	4.49E-06	**1.82E-05**	7.99E-05	**1.36E-04**	6.66E-04	**5.19E-03**	2.27E-02	**3.06E-04**	1.34E-03	**2.62E-03**	1.15E-02	**7.93E-07**	3.47E-06	**3.00E-05**
IDAPA Screening EL (lb/hr)	1.50E-06		2.80E-05		3.70E-06		3.30E-02		3.33E-01		2.70E-05		7.00E-03		1.30E-02		5.60E-07
EXCEEDS EL?	**Yes**		No		Yes		No		No		**Yes**		No		No		**Yes**

Facility Classification: Total Annual HAPs Emissions

3.94E-02 **Tons per year**

CONTROLLED TAP EMISSIONS **Note: Includes baghouses as process equipment.** **3,000 cy/day, and** **50,000 cy/year**

Emissions Point	Arsenic		Beryllium		Cadmium		Chromium		Manganese		Nickel		Phosphorus		Selenium		Chromium VI
	lb/hr annual avg.	T/yr[4]	lb/hr annual avg.	T/yr	lb/hr annual avg.	T/yr	lb/hr 24-hr avg.	T/yr[5]	lb/hr 24-hr avg.	T/yr	lb/hr annual avg.	T/yr	lb/hr 24-hr avg.	T/yr	lb/hr 24-hr avg.	T/yr	lb/hr annual avg.
Cement silo filling (with baghouse)[1]	5.94E-09	2.60E-08	6.81E-10	2.98E-09	3.28E-07	1.44E-06	8.90E-07	1.78E-07	3.59E-06	7.18E-07	5.86E-08	2.57E-07	ND	ND	ND	ND	8.13E-09
Cement supplement silo filling (with baghouse)[2]	2.08E-07	9.13E-07	1.88E-08	8.25E-08	4.13E-11	1.81E-10	3.74E-05	1.11E-06	7.86E-06	2.34E-07	4.75E-07	2.08E-06	1.09E-04	3.23E-06	3.30E-07	6.61E-08	7.63E-08
Truck loading (with baghouse)	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Central Mix Batching (WITH boot or shroud)	1.35E-07	5.91E-07	ND	ND	1.90E-10	8.32E-10	5.01E-07	1.00E-07	2.16E-05	4.31E-06	5.28E-08	2.31E-07	7.12E-06	1.42E-06	ND	ND	4.87E-09
Sources Total	**3.49E-07**	1.53E-06	**1.95E-08**	8.55E-08	**3.28E-07**	1.44E-06	**3.88E-05**	1.39E-06	**3.30E-05**	5.27E-06	**5.86E-07**	2.57E-06	**1.16E-04**	4.65E-06	**3.30E-07**	6.61E-08	**8.92E-08**
IDAPA Screening EL (lb/hr)	1.50E-06		2.80E-05		3.70E-06		3.30E-02		3.33E-01		2.70E-05		7.00E-03		1.30E-02		5.60E-07
Percent of EL	23.28%		0.07%		8.87%		0.12%		0.0099%		2.17%		1.65%		0.0025%		15.94%
EXCEEDS EL?	**No**		No		No		No		No		No		No		No		**No**

99.00% Boot, enclosure, or equivalent or baghouse or boot w/water ring

99.00% Baghouse control

1.70E-05 **Tons per year**

[1] lb/hr, annual average = EF x pound of cement / Yd^3 of concrete x annual concrete production rate / 2000lb/Ton / 8760 hr/yr; lb/hr, 24-hr = EF x pound of cement / Yd3 of concrete x daily concrete production rate / 2000lb/Ton / 24 hr/day

[2] lb/hr, annual average = EF x pound of cement supplement / Yd^3 of concrete x annual concrete production rate / 2000lb/Ton / 8760 hr/yr; lb/hr, 24-hr average = EF x pound of cement supplement / Yd3 of concrete x daily concrete production rate / 2000lb/Ton

[3] lb/hr, annual average = EF x pound of (cement + cement supplement) / Yd^3 of concrete x annual concrete production rate / 2000lb/Ton / 8760 hr/yr; lb/hr, 24-hr average = EF x pound of (cement + cement supplement) / Yd3 of concrete x daily concrete production

[4] T/yr = lb/hr, annual avg x 8760 hr/yr x (1T/2000 lb)

[5] T/yr = EF x pound of cement, or cement supplement, or cement + cement supplement x annual concrete production rate /2000 lb/ton / 2000 lb/ton

DIESEL COMBUSTION, AP-42 SECTION 1.3 (9/98)

12 MMBtu/hr / 140 MMBtu/10^3 gal = 8.57E-02 10^3 gal/hr **Fuel Use:**

Operating Assumptions: **10** hr/day **857.14 gal/day**

6,320 hr/yr **541,714 gal/year**

0.0015% sulfur

Criteria Air Pollutants	Emission Factor	Emissions		CBP + Boiler Emissions	Modeling Threshold		Modeling Required?	Modeling Threshold		Modeling Required?
	lb/10^3 gal	lb/hr	T/yr	T/yr	2002 Guidance			Case-by-Case		
NO2	20	1.71E+00	5.42E+00	5.42E+00	1	T/yr	YES	7	T/yr	No
CO	5	4.29E-01	1.35E+00	1.35E+00	14	lb/hr	No	70	lb/hr	No
PM10 (filterable + condensable)	3.3	2.83E-01	8.94E-01	9.01E-01	0.2	lb/hr	YES	0.9	lb/hr	No
		2.83E-01	8.94E-01		1	T/yr	No	7	T/yr	No
PM2.5 (filterable + condensable)	1.8	1.54E-01	4.88E-01	4.90E-01						
		1.54E-01	4.88E-01							
SOx (SO2 + SO3)	0.216	1.85E-02	5.85E-02	5.85E-02	0.2	lb/hr	No	0.9	lb/hr	No
		1.85E-02	5.85E-02		1	T/yr	No	7	T/yr	No
VOC (TOC)	0.556	4.77E-02	1.51E-01	1.51E-01	40	T/yr	No			
Lead EF = 9 lb/10^{12} Btu	9	1.08E-04	3.41E-04	1.48E-03	0.6	T/yr	No			
Lead, continued			1.71E-01	lb/quarter	**10**	lb/mo	No			
		TOTAL	**7.87E+00**	T/yr	Note: 100 lb/mo Pb in guidance reduced by factor of 10 based on latest Pb NAAQS (reduced in 2008 from 1.5 ug/m3 to 0.15 ug/m3)					

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)					Exceeds EL/ Modeling Required?
	lb/10^3 gal	lb/hr	T/yr	EL (lb/hr)	
PAH HAPs					
Acenaphthene	2.11E-05	**1.30E-06**	**9.41E-07**	9.10E-05	No
Acenaphthylene	2.57E-07	**1.59E-08**	**1.15E-08**	9.10E-05	No
Anthracene	1.22E-06	**7.54E-08**	**5.44E-08**	9.10E-05	No
Benzo(a)anthracene	4.01E-06	**2.48E-07**	**1.79E-07**	9.10E-05	See POM
Benzo(a)pyrene				2.00E-06	See POM
Benzo(b,k)fluoranthene	1.48E-06	**9.15E-08**	**6.60E-08**		See POM
Benzo(g,h,i)perylene	2.26E-06	**1.40E-07**	**1.01E-07**	9.10E-05	No
Benzo(k)fluoranthene	0.00E+00	**0.00E+00**	**0.00E+00**		See POM
Chrysene	2.38E-06	**1.47E-07**	**1.06E-07**		See POM
Dibenzo(a,h)anthracene	1.67E-06	**1.03E-07**	**7.45E-08**		See POM
Dichlorobenzene				9.10E-05	No
Fluoranthene	4.84E-06	**2.99E-07**	**2.16E-07**	9.10E-05	No
Fluorene	4.47E-06	**2.76E-07**	**1.99E-07**	9.10E-05	No
Indeno(1,2,3-cd)pyrene	2.14E-06	**1.32E-07**	**9.55E-08**		See POM
Naphthalene	1.13E-03	2.55E-02	8.06E-02	3.33	No
Naphthalene	1.13E-03	**6.99E-05**	**5.04E-05**	9.10E-05	No
Phenanathrene	1.05E-05	**6.49E-07**	**4.68E-07**	9.10E-05	No
Pyrene	4.25E-06	**2.63E-07**	**1.90E-07**	9.10E-05	No
Polycyclic Organic Matter (POM)	7-PAH Group	**7.22E-07**	**5.21E-07**	2.00E-06	No
Non-PAH HAPs					
Benzene	2.14E-04	**1.32E-05**	**9.55E-06**	8.00E-04	No
Ethyl benzene	6.36E-05	2.27E-06	7.18E-06	2.90E+01	No
Formaldehyde	3.30E-02	**2.04E-03**	**1.47E-03**	5.10E-04	YES
Hexane	1.80E+00	6.43E-02	2.03E-01	12	No
Toluene	6.20E-03	2.21E-04	7.00E-04	25	No
o-Xylene	1.09E-04			0.007	
Metals (HAPs)	lb/10^{12} Btu				
Arsenic	4.00E+00	**3.46E-05**	**2.50E-05**	1.50E-06	YES
Barium				0.033	No
Beryllium	3.00E+00	**2.60E-05**	**1.87E-05**	2.80E-05	No
Cadmium	3.00E+00	**2.60E-05**	**1.87E-05**	3.70E-06	YES
Chromium	3.00E+00	1.50E-05	4.74E-05	0.033	No
Cobalt				0.0033	No
Copper	6.00E+00	3.00E-05	9.48E-05	0.013	No
Manganese	6.00E+00	3.00E-05	9.48E-05	0.067	No
Mercury	3.00E+00	1.50E-05	4.74E-05	0.003	No
Molybdenum				0.333	No
Nickel	3.00E+00	**2.60E-05**	**1.87E-05**	2.70E-05	No
Selenium	1.50E+01	7.50E-05	2.37E-04	0.013	No
Vanadium				0.003	No
Zinc	4.00E+00	2.00E-05	6.32E-05	0.667	No

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

1,1,1-Trichloroethane 2.36E-04 Not a HAP (1,1,2 TCA is a HAP). Not a 585 or 586 TAP.

Case-by-Case Modeling Thresholds may be used ONLY with DEQ Approval

TOTAL CBP + WATER HEATER EMISSIONS (POINT SOURCES, T/YR)	8.37

Facility: Champion Concrete, Inc.

7/27/2020 16:13 Permit/Facility ID: P-2018.0034 Project 62441 023-00009

Greenhouse Gas Emissions when Combusting Natural Gas

Water Heater #1 Emissions	Emission Factor (EF)	EF Units	EF Source	T/yr	Global Warming Potential	CO_2e (T/yr)
CO_2	0	lb/MMscf	AP-42 Table 1.4-2	0.00	1	0.00
Methane	0	lb/MMscf	AP-42 Table 1.4-2	0.00E+00	21	0.00E+00
N_2O	0	lb/MMscf	AP-42 Table 1.4-2	0.00E+00	310	0.00E+00

* Water Heater #1 does not burn Natural Gas.

Water Heater #2 Emissions	Emission Factor (EF)	EF Units	EF Source	T/yr	Global Warming Potential	CO_2e (T/yr)
CO_2	0	lb/MMscf	AP-42 Table 1.4-2	0.00	1	0.00
Methane	0	lb/MMscf	AP-42 Table 1.4-2	0.00E+00	21	0.00E+00
N_2O	0	lb/MMscf	AP-42 Table 1.4-2	0.00E+00	310	0.00E+00

* Water Heater #2 does not burn Natural Gas.

Greenhouse Gas Emissions when Combusting #2 Diesel

Water Heater #1 Emissions	Emission Factor (EF)	EF Units	EF Source	T/yr	Global Warming Potential	CO_2e (T/yr)
CO_2	Molecular conversion from C to CO_2			3044.00	1	3044.00
Methane	1	lb/10^3 gal	AP-42 Table 1.3-3	1.15E-01	21	2.42E+00
N_2O	0.53	lb/10^3 gal	AP-42 Table 1.3-8	6.11E-02	310	1.89E+01

* Assumes a fuel heating value of 137,030 gal/Btu, a density of 7.2 lb/gal, a 44:12 CO2 to CO MW ratio and a heater with a rating of 5 MMBtu/hr.

Water Heater #2 Emissions	Emission Factor (EF)	EF Units	EF Source	T/yr	Global Warming Potential	CO_2e (T/yr)
CO_2	Mocular conversion from C to CO_2			4261.61	1	4261.61
Methane	1	lb/10^3 gal	AP-42 Table 1.3-3	1.61E-01	21	3.39E+00
N_2O	0.53	lb/10^3 gal	AP-42 Table 1.3-8	8.56E-02	310	2.65E+01

* Assumes a fuel heating value of 137,030 gal/Btu, a density of 7.2 lb/gal, a 44:12 CO2 to CO MW ratio and a heater with a rating of 7 MMBtu/hr.

Greenhouse Gas Emissions when Combusting LPG

Water Heater #1 Emissions	Emission Factor (EF)	EF Units	EF Source	T/yr	Global Warming Potential	CO_2e (T/yr)
CO_2	0	lb/10^3 gal	AP-42 Table 1.5-1	0.00	1	0.00
Methane	0	lb/10^3 gal	AP-42 Table 1.5-1	0.00E+00	21	0.00E+00
N_2O	0	lb/10^3 gal	AP-42 Table 1.5-1	0.00E+00	310	0.00E+00

* Water Heater #1 does not burn Propane.

Water Heater #2 Emissions	Emission Factor (EF)	EF Units	EF Source	T/yr	Global Warming Potential	CO_2e (T/yr)
CO_2	0	lb/10^3 gal	AP-42 Table 1.5-1	0.00	1	0.00
Methane	0	lb/10^3 gal	AP-42 Table 1.5-1	0.00E+00	21	0.00E+00
N_2O	0	lb/10^3 gal	AP-42 Table 1.5-1	0.00E+00	310	0.00E+00

* Water Heater #2 does not burn Propane.

Greenhouse Gas Emissions when Combusting Diesel Fuel

Small Engine #1 Emissions ≤ 600 bhp	Emission Factor (EF)	EF Units	EF Source	T/yr	Global Warming Potential	CO_2e (T/yr)
CO_2	1.15	lb/bhp-hr	AP-42 Table 3.3-1	0.00	1	0.00

* There are no engines at this facility.

Small Engine #2 Emissions ≤ 600 bhp	Emission Factor (EF)	EF Units	EF Source	T/yr	Global Warming Potential	CO_2e (T/yr)
CO_2	1.15	lb/bhp-hr	AP-42 Table 3.3-1	0.00	1	0.00

* There is no second small engine at this facility.

Large Engine #1 Emissions > 600 bhp	Emission Factor (EF)	EF Units	EF Source	T/yr	Global Warming Potential	CO_2e (T/yr)
CO_2	1.16	lb/bhp-hr	AP-42 Table 3.4-1	0.00	1	0.00

* There is no large engine at this facility.

Total Greenhouse Gas Emissions

	CO_2e (T/yr)
CO_2	7305.61
Methane	5.81
N_2O	45.47
Total	**7356.89**

Facility: **Champion Concrete, Inc.**
7/27/2020 16:13 **Permit/Facility ID:** **023-00009** **P-2018.0034 Project 62441**

Max Hourly Production	300 cy/hr	**82%** T/hr is Aggregate =	**246 cy/hr**
Max Daily Production	3,000 cy/day	82% T/hr is Aggregate =	**2,460 cy/day**
Max Annual Production	50,000 cy/yr	82% T/hr is Aggregate =	**41,000 cy/yr**

Aggregate is considered both coarse and fine (sand).The 82% is based on 1,865 lb coarse aggregate, 1,428 lb sand, 564 lb cement/supplement and 167 lb water for a total of 4,024 lb concrete

Truck Mix Operations Drop Points, AP-42 11-12 (06/06)

$E = k (0.0032) x(U^a / M^b)+c$ = 9.71E-02 3.88E-02 lb/ton for PM10 5.83E-03 lb/ton for PM2.5

k = particle size multiplier	0.8 for PM	0.32 for PM10	0.048 for PM2.5
a = exponent	1.75 for PM	1.75 for PM10	1.75 for PM2.5
b = exponent	0.3 for PM	0.3 for PM10	0.3 for PM2.5
c = constant	0.013 for PM	0.0052 for PM10	0.00078 for PM2.5
U = mean wind speed =	**10** mph		
M = moisture content =	**6** %		

Mean wind spped: 7 mph was the average wind speed obtained from an average of 19 Idaho airports throughout the state from 1996-2006. This data is from the Western Regional Climate Center (http://www.wrcc.dri.edu/htmlfiles/westwind.final.html#IDAHO).

Moisture Content: 4.17 % and 1.77% were the average percentages for sand and aggegate respectively. These values are based on EPA tests conducted at Cheney Enterprises Cement plant in Roanoke, VA, 1994. (AP-42 11-12 06/06).

Windspeed Variation Factors for AERMOD modeling:				PM10		PM2.5	
Wind Category	Upper windspeed (m/sec)	Avg windspeed (m/sec)	Avg windspeed (mph)	E @ avg mph	F = Eavg mph/ E@10mph	E @ avg mph	mph/ E@10mph
Cat 1:	1.54	0.77	1.72	6.75E-03	0.1738	1.01E-03	0.1738
Cat 2:	3.09	2.32	5.18	1.58E-02	0.4077	2.38E-03	0.4077
Cat 3:	5.14	4.12	9.20	3.43E-02	0.8831	5.15E-03	0.8831
Cat 4:	8.23	6.69	14.95	7.32E-02	1.885	1.10E-02	1.885
Cat 5:	10.80	9.52	21.28	1.31E-01	3.382	1.97E-02	3.382
Cat 6:	14.00	12.40	27.74	2.06E-01	5.298	3.09E-02	5.298

Central Mix Operations Drop Points, AP-42 11-12 (06/06)

$E = k (0.0032) x(U^a / M^b)+c$ = 2.08E-03 1.23E-03 lb/ton for PM10 2.54E-04 lb/ton for PM2.5

k = particle size multiplier	0.19 for PM	0.13 for PM10	0.03 for PM2.5
a = exponent	0.95 for PM	0.45 for PM10	0.45 for PM2.5
b = exponent	0.9 for PM	0.9 for PM10	0.9 for PM2.5
c = constant	0.001 for PM	0.001 for PM10	0.0002 for PM2.5
U = mean wind speed =	**10** mph		
M = moisture content =	**6** %		

Mean wind spped: 7 mph was the average wind speed obtained from an average of 19 Idaho airports throughout the state from 1996-2006. This data is from the Western Regional Climate Center (http://www.wrcc.dri.edu/htmlfiles/westwind.final.html#IDAHO).

Moisture Content: 4.17 % and 1.77% were the average percentages for sand and aggegate respectively. These values are based on EPA tests conducted at Cheney Enterprises

Windspeed Variation Factors for AERMOD modeling:				PM10		PM2.5	
Wind Category	Upper windspeed (m/sec)	Avg windspeed (m/sec)	Avg windspeed (mph)	E @ avg mph	F = Eavg mph/ E@10mph	E @ avg mph	mph/ E@10mph
Cat 1:	1.54	0.77	1.72	1.11E-03	0.8964	2.24E-04	0.8838
Cat 2:	3.09	2.32	5.18	1.87E-03	1.5160	2.40E-04	0.9456
Cat 3:	5.14	4.12	9.20	2.13E-03	1.7261	2.52E-04	0.9922
Cat 4:	8.23	6.69	14.95	2.41E-03	1.949	2.65E-04	1.0422
Cat 5:	10.80	9.52	21.28	2.65E-03	2.146	2.76E-04	1.0860
Cat 6:	14.00	12.40	27.74	2.86E-03	2.315	2.85E-04	1.1238

Conveyor and Scalping Screen Emission Points

Moisture/Control %:

Aggregate for CBP typically stabilizes between 5-6% by weight--> Apply additional **25%** control to lb/hr, etc. for the higher moisture.

Sand aggregate for CBPs is **36%**

Coarse aggregate for CBPs is **46%**

Fine Aggegate (Sand) Transfer to Conveyor Transfer from truck to conveyor: **246 cy/hr** **11** Transfer Points

Pollutant	Emission Factor Table 11.12-5 CONVEYOR TRANSFER PT CONTROLLED (lb/cy)	Emissions Per Transfer Point				Total Emissions			
		Emissions (lb/hr) 1-hr Average	Emissions (lb/hr) 24-hr Average	Emissions (T/yr)	Emissions (lb/hr) Annual Average	Emissions (lb/hr) 1-hr Average	Emissions (lb/hr) 24-hr Average	Emissions (T/yr)	Emissions (lb/hr) Annual Average
PM (total)	0.0015	0.120	0.050	9.98E-03	2.28E-03	1.318	0.549	1.10E-01	2.51E-02
PM-10 (total)	7.00E-04	0.056	0.023	4.66E-03	1.06E-03	0.615	0.256	5.13E-02	1.17E-02
PM-2.5 (total)	2.25E-04	0.018	0.007	1.50E-03	6.56E-03	0.198	0.082	1.65E-02	7.22E-02

0.186

1.256

Coarse Aggregate Transfer to Conveyor Transfer from truck to conveyor: **246 cy/hr** **11** Transfer Points

Pollutant	Emission Factor Table 11.12-5 CONVEYOR TRANSFER PT CONTROLLED (lb/cy)	Emissions Per Transfer Point				Total Emissions			
		Emissions (lb/hr) 1-hr Average	Emissions (lb/hr) 24-hr Average	Emissions (T/yr)	Emissions (lb/hr) Annual Average	Emissions (lb/hr) 1-hr Average	Emissions (lb/hr) 24-hr Average	Emissions (T/yr)	Emissions (lb/hr) Annual Average
PM (total)	0.0064	0.662	0.276	5.52E-02	1.26E-02	7.286	3.036	6.07E-01	1.39E-01
PM-10 (total)	3.10E-03	0.321	0.134	2.67E-02	6.10E-03	3.529	1.471	2.94E-01	6.71E-02
PM-2.5 (total)	9.60E-04	0.099	0.041	8.28E-03	3.63E-02	1.093	0.455	9.11E-02	3.99E-01

Final Concrete Batch Plant Emissions Inventory

Listed Below are the emissions estimates for the units selected.

Company:	**Champion Concrete, Inc.**
Facility ID:	**023-00009**
Permit No.:	**P-2018.0034 Project 62441**
Source Type:	**Stationary Concrete Batch Plant**
Manufacturer/Model:	**Coneco/448 S Central Mix Batch Plant**

Production

Maximum Hourly Production Rate:	300	cy/hr
Proposed Daily Production Rate:	3000	cy/day
Proposed Maximum Annual Production Rate:	50000	cy/year

Tons/year

Emissions Units		$PM_{2.5}$	PM_{10}	SO_2	NO_x	CO	VOC	Lead	THAPs	CO_2e
CBP Type:	**Central Mix**	0.002	0.01	NA	NA	NA	NA	2.85E-05		N/A
Water Heater #1:	**5 MMBtu/hr Diesel-fired Heater**	0.203	0.372	2.44E-02	2.257	0.564	0.063	1.42E-04		3065
Water Heater #2:	**7 MMBtu/hr Diesel-fired Heater**	0.284	0.521	3.41E-02	3.160	0.790	0.088	1.99E-04		4292
Small Diesel Engine(s) *:	**No Engine**	0.00	0.00	0.00E+00	0.00	0.00	0.00	NA		0
Large Diesel Engine *:	**No Large Engine**	0.00	0.00	0.00E+00	0.00	0.00	0.00	NA		0
	Annual Totals (T/yr)	**0.49**	**0.90**	**5.85E-02**	**5.42**	**1.35**	**0.15**	**3.70E-04**	**2.87E-01**	**7357**

Pounds/hour

		$PM_{2.5}$	PM_{10}	SO_2	NO_x	CO	VOC	Lead	THAPs
CBP Type:	**Central Mix**	0.041	0.09	NA	NA	NA	NA	6.82E-06	
Water Heater #1:	**5 MMBtu/hr Diesel-fired Heater**	0.064	0.118	7.71E-03	0.714	0.179	0.020	4.50E-05	
Water Heater #2:	**7 MMBtu/hr Diesel-fired Heater**	0.090	0.165	1.08E-02	1.000	0.250	0.028	6.30E-05	
Small Diesel Engine(s) *:	**No Engine**	0.00	0.00	0.00E+00	0.00	0.00	0.00	NA	
Large Diesel Engine*:	**No Large Engine**	0.00	0.00	0.00E+00	0.00	0.00	0.00	NA	
	Daily Totals (lb/hr)	**0.20**	**0.38**	**1.85E-02**	**1.71**	**0.43**	**0.05**	**1.15E-04**	**9.26E-02**

* The Large engine may run : **There is no large engine.** hr/yr
* The Small engine(s) may run : **There is no small engine.** hr/yr

HAPS & TAPS Emissions Inventory

Metals	HAP	TAP	lb/hr	T/yr	Averaging Period	EL lb/hr	Exceeded?
Arsenic	X	X	**3.50E-05**	**2.65E-05**	Annual	1.50E-06	**Yes**
Barium		X	**0.00E+00**	**0.00E+00**	24-hour	3.30E-02	**No**
Beryllium	X	X	**2.60E-05**	**1.88E-05**	Annual	2.80E-05	**No**
Cadmium	X	X	**2.63E-05**	**2.02E-05**	Annual	3.70E-06	**Yes**
Cobalt	X	X	**0.00E+00**	**0.00E+00**	24-hour	3.30E-03	**No**
Copper		X	**3.00E-05**	**9.48E-05**	24-hour	1.30E-02	**No**
Chromium	X	X	**5.38E-05**	**4.88E-05**	24-hour	3.30E-02	**No**
Manganese	X	X	**6.30E-05**	**1.00E-04**	24-hour	3.33E-01	**No**
Mercury	X	X	**1.50E-05**	**4.74E-05**	24-hour	N/A	**No**
Molybdenum (soluble)		X	**0.00E+00**	**0.00E+00**	24-hour	3.33E-01	**No**
Nickel	X	X	**2.66E-05**	**2.13E-05**	Annual	2.70E-05	**No**
Phosphorus	X	X	**1.16E-04**	**4.65E-06**	24-hour	7.00E-03	**No**
Selenium	X	X	**7.53E-05**	**2.37E-04**	24-hour	1.30E-02	**No**
Vanadium		X	**0.00E+00**	**0.00E+00**	24-hour	3.00E-03	**No**
Zinc		X	**2.00E-05**	**6.32E-05**	24-hour	6.67E-01	**No**
Chromium VI	X	X	**8.92E-08**	**3.91E-07**	Annual	5.60E-07	**No**
Non PAH Organic Compunds							
Pentane		X	**0.00E+00**	**0.00E+00**	24-hour	118	**No**
Methyl Ethyl Ketone	X	X	**0.00E+00**	**0.00E+00**	24-hour	39.3	**No**
Non-PAH HAPs							
Acetaldehyde	X	X	**0.00E+00**	**0.00E+00**	Annual	3.00E-03	**No**
Acrolein	X	X	**0.00E+00**	**0.00E+00**	24-hour	1.70E-02	**No**
Benzene	X	X	**1.32E-05**	**9.55E-06**	Annual	8.00E-04	**No**
1,3 - Butadiene	X	X	**0.00E+00**	**0.00E+00**	Annual	2.40E-05	**No**
Ethyl Benzene	X	X	**2.27E-06**	**7.18E-06**	24-hour	29	**No**
Formaldehyde	X	X	**2.04E-03**	**1.47E-03**	Annual	5.10E-04	**Yes**
Hexane	X	X	**6.43E-02**	**2.03E-01**	24-hour	12	**No**
Methyl Chloroform	X	X	**0.00E+00**	**0.00E+00**	24-hour	127	**No**
Propionaldehyde	X	X	**0.00E+00**	**0.00E+00**	24-hour	2.87E-02	**No**
Quinone	X	X	**0.00E+00**	**0.00E+00**	24-hour	2.70E-02	**No**
Toluene	X	X	**2.21E-04**	**7.00E-04**	24-hour	25	**No**
o-Xylene	X	X	**0.00E+00**	**0.00E+00**	24-hour	29	**No**
PAH HAPs							
2-Methylnaphthalene	X	X	**0.00E+00**	**0.00E+00**	Annual	9.10E-05	**No**
3-Methylcholanthrene	X	X	**0.00E+00**	**0.00E+00**	Annual	2.50E-06	**No**
7,12-Dimethylbenz(a)anthracene	X		**0.00E+00**	**0.00E+00**	N/A	N/A	**N/A**
Acenaphthene	X	X	**1.30E-06**	**9.41E-07**	Annual	9.10E-05	**No**
Acenaphthylene	X	X	**1.59E-08**	**1.15E-08**	Annual	9.10E-05	**No**
Anthracene	X	X	**7.54E-08**	**5.44E-08**	Annual	9.10E-05	**No**
Benzo(a)anthracene	X	X	**2.48E-07**	**1.79E-07**	Annual	9.10E-05	**No**
Benzo(a)pyrene	X	X	**0.00E+00**	**0.00E+00**	Annual	2.00E-06	**No**
Benzo(b)fluoranthene	X	X	**9.15E-08**	**6.60E-08**	Annual	2.00E-06	**No**
Benzo(e)pyrene	X	X	**0.00E+00**	**0.00E+00**	Annual	2.00E-06	**No**
Benzo(g,h,i)perylene	X	X	**1.40E-07**	**1.01E-07**	Annual	9.10E-05	**No**
Benzo(k)fluoranthene	X	X	**0.00E+00**	**0.00E+00**	Annual	2.00E-06	**No**
Chrysene	X	X	**1.47E-07**	**1.06E-07**	Annual	2.00E-06	**No**
Dibenzo(a,h)anthracene	X	X	**1.03E-07**	**7.45E-08**	Annual	2.00E-06	**No**
Dichlorobenzene	X	X	**0.00E+00**	**0.00E+00**	Annual	9.10E-05	**No**
Fluoranthene	X	X	**2.99E-07**	**2.16E-07**	Annual	9.10E-05	**No**
Fluorene	X	X	**2.76E-07**	**1.99E-07**	Annual	9.10E-05	**No**
Indeno(1,2,3-cd)pyrene	X	X	**1.32E-07**	**9.55E-08**	Annual	2.00E-06	**No**
Naphthalene (24-hour)	X	X	**2.55E-02**	**8.06E-02**	24-hour	3.33	**No**
Naphthalene (Annual)	X	X	**6.99E-05**	**5.04E-05**	Annual	9.10E-05	**No**
Perylene	X		**0.00E+00**	**0.00E+00**	N/A	N/A	**N/A**
Phenanathrene	X	X	**6.49E-07**	**4.68E-07**	Annual	9.10E-05	**No**
Pyrene	X	X	**2.63E-07**	**1.90E-07**	Annual	9.10E-05	**No**
PAH HAPs Total	X	X	**7.22E-07**		Annual	2.00E-06	**No**
Polycyclic Organic Matter (POM)	X	X	**7.22E-07**	**5.21E-07**	Annual	2.00E-06	**No**

Total HAPs Emissions (lb/hr) and (T/yr): 9.26E-02 2.87E-01

Uncontrolled Criteria Pollutants

Source	PM10/PM2.5	SO2	NOx	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Concrete Batch Plant	1.05E-01	N/A	N/A	N/A	N/A
Water Heater #1	3.72E-01	2.44E-02	2.26E+00	5.64E-01	6.27E-02
Water Heater #2	5.21E-01	3.41E-02	3.16E+00	7.90E-01	8.78E-02
Small Diesel Engine	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Large Diesel Engine	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Note: The emissions from the transfer drop points are the emissions from the material handling

Facility: Champion Concrete, Inc.
7/27/2020 16:13 **Permit** P-2018.0034 Project 62441 **Facility ID:** 023-00009

Internal Combustion Engine > 600 hp (447 kW)

Fuel Type Toggle =	0	
Fuel Consumption Rate	0.00	gal/hr
Calculated MMBtu/hr	0.00	MMBtu/hr
Max Daily Operation	0	hr/day
Max Annual Operation	0	hrs/yr

Rated Power of Large (hp): 0

Not EPA Certified:	No
Certified EPA Tier 1:	No
Certified EPA Tier 2:	No
Certified EPA Tier 3:	No
Certified EPA Tier 4:	No
Blue Sky Engine:	No

Small Internal Combustion Engine #1 < 600 hp (447 kW)

Fuel Type Toggle =	0	
Fuel Consumption Rate	0.00	gal/hr
Calculated MMBtu/hr	0.00	MMBtu/hr
Max Daily Operation	10	hr/day
Max Annual Operation	0	hrs/yr

Rated Power of Small #1 (hp): 0

Not EPA Certified:	No
Certified EPA Tier 1:	No
Certified EPA Tier 2:	No
Certified EPA Tier 3:	No
Certified EPA Tier 4:	No
Blue Sky Engine:	No

Small Internal Combustion Engine #2 < 600 hp (447 kW)

Fuel Type Toggle =	0	
Fuel Consumption Rate	0.00	gal/hr
Calculated MMBtu/hr	0.00	MMBtu/hr
Max Daily Operation	10	hr/day
Max Annual Operation	0	hrs/yr

Rated Power of Small #2 (hp): 0

Not EPA Certified:	No
Certified EPA Tier 1:	No
Certified EPA Tier 2:	No
Certified EPA Tier 3:	No
Certified EPA Tier 4:	No
Blue Sky Engine:	No

Conversion Factors:

Avg brake-specific fuel consumption (BSFC) =	7000	Btu/hp-hr
1 hp =	0.746	kW
1 lb =	453.592	g

g/kW-hr x (lb/453g) x (hp-hr/7000 Btu) x (0.746 kW/hp) x 10^6 Btu/MMBtu = lb/MMBtu
g/kW-hr x 0.23486 = lb/MMBtu

Pollutant:	NOx	VOC (total TOC--> VOCs)		CO	PM=PM10
EMISSION FACTORS USED FOR SMALL ENGINE (lb/MMBtu):	**0.00**	**0.00**		**0.00**	**0.000**

Pollutant:	NOx	VOC (total TOC--> VOCs)		CO	PM=PM10
EMISSION FACTORS USED FOR LARGE ENGINE (lb/MMBtu):	**0.00**	**0.00**		**0.00**	**0.000**

AP-42, 3.4 (10/96) EMISSION FACTORS (diesel fueled, uncontrolled)

Pollutant:	NOx	VOC (total TOC--> VOCs)		CO	PM10
Emission Factor (lb/MMBtu)	0	0		0.00	0
Emission Factor (g/kW-hr))	0.00	0.00		0.00	0.00

AP-42, Ch 3.3 (10/96) EMISSION FACTORS (diesel fueled, uncontrolled)

Pollutant:	NOx	VOC (total TOC--> VOCs)		CO	PM10
Emission Factor (lb/MMBtu)	4.41	0.36		0.95	0.31
Emission Factor (g/kW-hr))	18.78	1.53		4.05	1.32

Note: Rating for AP-42 PM10 EF of 0.0573 is "E" or Poor. Used Tier 1 PM EF and presumed PM = PM10

40 CFR 89 and 1039, EPA CERTIFIED GENERATOR EMISSION FACTORS (g/kW-hr converted to lb/MMBtu)

Rated Power (kW)	Tier	Applicable?	Model Year[1]	NOx	HC	NMHC + NOx	CO	PM = PM10
kW < 8	1	0	2000	0.0	*0.36*	2.47	1.88	0.23
kW < 8	2	0	2005	0.00	*0.36*	1.76	1.88	0.19
kW < 8	4	0	2008	0.00	*0.36*	1.76	1.88	0.09
kW < 8	BlueSky	0	n/a	0.00	*0.36*	1.08	1.88	0.11
8 ≤ kW < 19	1	0	2000	0.00	*0.36*	2.23	1.55	0.19
8 ≤ kW < 19	2	0	2005	0.00	*0.36*	1.76	1.55	0.19
8 ≤ kW < 19	4	0	2008	0.00	*0.36*	1.76	1.55	0.09
8 ≤ kW < 19	BlueSky	0	n/a	0.00	*0.36*	1.06	1.55	0.11
19 ≤ kW < 37	1	0	1999	0.00	*0.36*	2.23	1.29	0.19
19 ≤ kW < 37	2	0	2004	0.00	*0.36*	1.76	1.29	0.14
19 ≤ kW < 37	4	0	2008	0.00	*0.36*	1.10	1.29	0.007
19 ≤ kW < 37	BlueSky	0	n/a	0.00	*0.36*	1.06	1.29	0.085
37 < kW < 75	1	0	1998	2.16	*0.36*	0.00	---	---
37 ≤ kW < 75	2	0	2004	0.00	*0.36*	1.76	1.17	0.09
37 ≤ kW < 75	3	0	2008	0.00	*0.36*	1.10	1.17	0.09
37 ≤ kW < 75	4	0	2008	0.00	*0.36*	1.10	1.17	0.007
37 ≤ kW < 75	BlueSky	0	n/a	0.00	*0.36*	1.10	1.17	0.056
75 ≤ kW < 130	1	0	1997	2.16	*0.36*	0.00	---	---
75 ≤ kW < 130	2	0	2003	0.00	*0.36*	1.55	1.17	0.07
75 ≤ kW < 130	3	0	2007	0.00	*0.36*	0.94	1.17	0.07
75 ≤ kW < 130	4	0	2008	0.09	0.04	0.00	1.17	0.005
75 ≤ kW < 130	BlueSky	0	n/a	0.00	*0.36*	0.94	1.17	0.042
130 ≤ kW < 225	1	0	1996	2.16	0.31	0.00	2.68	0.13
130 ≤ kW < 225	2	0	2003	0.00	0.31	1.55	0.82	0.05
130 ≤ kW < 225	3	0	2006	0.00	0.31	0.94	0.82	0.05
130 ≤ kW < 560	4	0	2008	0.09	0.04	0.00	0.82	0.005
130 ≤ kW ≤ 560	BlueSky	0	n/a	0.00	0.31	0.94	0.82	0.028
225 ≤ kW < 450	1	0	1996	2.16	0.31	0.00	2.68	0.13
225 ≤ kW < 450	2	0	2001	0.00	0.31	1.50	0.82	0.05
225 ≤ kW < 450	3	0	2006	0.00	0.31	0.94	0.82	0.05
450 ≤ kW ≤ 560	1	0	1996	2.16	0.31	0.00	2.68	0.13
450 ≤ kW ≤ 560	2	0	2002	*0.00*	0.31	1.50	0.82	0.05
450 ≤ kW ≤ 560	3	0	2006	0.00	0.31	0.94	0.82	0.05
kW > 560	1	0	2000	2.16	0.31	0.00	2.68	0.13
kW > 560	2	0	2006	0.00	0.31	1.50	0.82	0.05
kW > 560	BlueSky	0	n/a	0.00	0.31	0.89	0.82	0.028

40 CFR 89 and 1039, EPA CERTIFIED GENERATOR EMISSION FACTORS FOR LARGE ENGINE (lb/MMBtu)

Rated Power (kW)	Tier	Applicable?	Model Year[1]	NOx	HC	NMHC + NOx	CO	PM10
kW< 8	1	0	2000	0.00	0.00	0.00	0.00	0.00
kW< 8	2	0	2005	0.00	0.00	0.00	0.00	0.00
kW< 8	4	0	2008	0.00	0.00	0.00	0.00	0.00
kW< 8	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00
8 ≤ kW < 19	1	0	2000	0.00	0.00	0.00	0.00	0.00
8 ≤ kW < 19	2	0	2005	0.00	0.00	0.00	0.00	0.00
8 ≤ kW < 19	4	0	2008	0.00	0.00	0.00	0.00	0.00
8 ≤ kW < 19	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00
19 ≤ kW < 37	1	0	1999	0.00	0.00	0.00	0.00	0.00
19 ≤ kW < 37	2	0	2004	0.00	0.00	0.00	0.00	0.00
19 ≤ kW < 37	4	0	2008	0.00	0.00	0.00	0.00	0.00
19 ≤ kW < 37	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 75	1	0	1998	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 75	2	0	2004	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 75	3	0	2008	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 75	4	0	2008	0.00	0.00	0.00	0.00	0.00
37 ≤ kW < 75	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00
75 ≤ kW < 130	1	0	1997	0.00	0.00	0.00	0.00	0.00
75 ≤ kW < 130	2	0	2003	0.00	0.00	0.00	0.00	0.00
75 ≤ kW < 130	3	0	2007	0.00	0.00	0.00	0.00	0.00
75 ≤ kW < 130	4	0	2008	0.00	0.00	0.00	0.00	0.00
75 ≤ kW < 130	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00
130 ≤ kW < 225	1	0	1996	0.00	0.00	0.00	0.00	0.00
130 ≤ kW < 225	2	0	2003	0.00	0.00	0.00	0.00	0.00
130 ≤ kW < 225	3	0	2006	0.00	0.00	0.00	0.00	0.00
130 < kW < 560	4	0	2008	0.00	0.00	0.00	0.00	0.00
130 ≤ kW ≤ 560	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00
225 ≤ kW < 450	1	0	1996	0.00	0.00	0.00	0.00	0.00
225 ≤ kW < 450	2	0	2001	0.00	0.00	0.00	0.00	0.00
225 ≤ kW < 450	3	0	2006	0.00	0.00	0.00	0.00	0.00
450 ≤ kW ≤ 560	1	0	1996	0.00	0.00	0.00	0.00	0.00
450 ≤ kW ≤ 560	2	0	2002	0.00	0.00	0.00	0.00	0.00
450 ≤ kW ≤ 560	3	0	2006	0.00	0.00	0.00	0.00	0.00
kW > 560	1	0	2000	0.00	0.00	0.00	0.00	0.00
kW > 560	2	0	2006	0.00	0.00	0.00	0.00	0.00
kW > 560	BlueSky	0	n/a	0.00	0.00	0.00	0.00	0.00

APPENDIX B – AMBIENT AIR QUALITY IMPACT ANALYSES

M E M O R A N D U M DRAFT

DATE: July 6, 2020

TO: Christina Boulay, Permit Writer, Air Program

FROM: Kevin Schilling, Stationary Source Modeling Coordinator, Air Program

PROJECT: P-2018.0034 PROJ 62441, Modification of Permit to Construct for Champion Concrete, Inc. Concrete Batch Plant, located at the Naval Reactors Facility on the Idaho National Laboratories site in eastern Idaho.

SUBJECT: Demonstration of Compliance with IDAPA 58.01.01.203.02 (NAAQS) and 203.03 (TAPs) as it relates to air quality impact analyses.

Contents

Acronyms, Units, and Chemical Nomenclature

AAC	Acceptable Ambient Concentration of a non-carcinogenic TAP
AACC	Acceptable Ambient Concentration of a Carcinogenic TAP
acfm	Actual cubic feet per minute
AERMAP	The terrain data preprocessor for AERMOD
AERMET	The meteorological data preprocessor for AERMOD
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
Appendix W	40 CFR 51, Appendix W – Guideline on Air Quality Models
As	Arsenic
BPIP	Building Profile Input Program
BRC	Below Regulatory Concern
CBP	Concrete Batch Plant
Cd	Cadmium
CFR	Code of Federal Regulations
Champion	Champion Concrete, Inc.
CMAQ	Community Multi-Scale Air Quality Modeling System
CO	Carbon Monoxide
DEM	Digital Elevation Map
DEQ	Idaho Department of Environmental Quality
EL	Emissions Screening Level of a TAP
EPA	United States Environmental Protection Agency
GB	Americrete Ready Mix dba GB Redi-Mix
GEP	Good Engineering Practice
hr	hours
Idaho Air Rules	Rules for the Control of Air Pollution in Idaho, located in the Idaho Administrative Procedures Act 58.01.01
ISCST3	Industrial Source Complex Short Term 3 dispersion model
K	Kelvin
m	Meters
m/sec	Meters per second
MMBtu	Million British Thermal Units
NAAQS	National Ambient Air Quality Standards
NO	Nitrogen Oxide
NO_2	Nitrogen Dioxide
NOx	Oxides of Nitrogen
NWS	National Weather Service
O_3	Ozone
Pb	Lead
PM_{10}	Particulate matter with an aerodynamic particle diameter less than or equal to a nominal 10 micrometers
$PM_{2.5}$	Particulate matter with an aerodynamic particle diameter less than or equal to a nominal 2.5 micrometers
ppb	parts per million
PRIME	Plume Rise Model Enhancement

PTC	Permit to Construct
PTE	Potential to Emit
SIL	Significant Impact Level
SO_2	Sulfur Dioxide
TAP	Toxic Air Pollutant
tpy	tons per year
USGS	United States Geological Survey
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compounds
$\mu g/m^3$	Micrograms per cubic meter of air

1.0 Summary

Champion Concrete, Inc. (Champion) submitted an application to modify existing Permit to Construct (PTC) P-2018.0034 for their stationary concrete batch plant (CBP), consisting of a main CBP and a backup CBP, located at the Naval Reactors Facility (NRF) on the Idaho National Laboratories (INL) site in eastern Idaho. Idaho Administrative Procedures Act 58.01.01.203.02 and 203.03 (Idaho Air Rules Section 203.02 and 203.03) requires that no permit be issued unless it is demonstrated that applicable emissions do not result in violation of a National Ambient Air Quality Standard (NAAQS) or Toxic Air Pollutant (TAP) increment.

The proposed modification increases allowable operational hours of two boilers and increases annual allowable concrete production. Facility-wide emissions of criteria pollutants were below levels defined as Below Regulatory Concern (BRC), so no NAAQS compliance demonstrations were required for permit issuance. TAP emission increases resulting from the increase in production were below screening emission levels (ELs), and project-specific impact modeling analyses were not required for permit issuance. This memorandum provides a summary of the applicability assessment for analyses and air impact analyses used to demonstrate compliance with applicable NAAQS and TAP increments, as required by Idaho Air Rules Section 203.02 and 203.03.

DEQ review of submitted data and DEQ analyses summarized by this memorandum addressed only the rules, policies, methods, and data pertaining to the air impact analyses used to demonstrate that estimated emissions associated with operation of the facility will not cause or significantly contribute to a violation of any applicable air quality standard. This review did not address/evaluate compliance with other rules or analyses not pertaining to the air impact analyses. Evaluation of emission estimates was the responsibility of the DEQ permit writer and is addressed in the main body of the DEQ Statement of Basis, and emission calculation methods were not evaluated in this modeling review memorandum.

Table 1 presents key assumptions and results to be considered in the development of the permit. Idaho Air Rules require air impact analyses be conducted in accordance with methods outlined in 40 CFR 51, Appendix W *Guideline on Air Quality Models* (Appendix W). Appendix W requires that air quality impacts be assessed using atmospheric dispersion models with emissions and operations representative of design capacity or as limited by a federally enforceable permit condition.

The submitted information and DEQ analyses: 1) showed either a) that estimated potential/allowable emissions are at a level defined as BRC and do not require a NAAQS compliance demonstration, or b) that criteria pollutant emissions increases resulting from the proposed project are below site-specific modeling applicability thresholds, developed to assure that emissions below such levels will not result in ambient air impacts exceeding Significant Impact Levels (SILs); 2) showed that TAP emission increases associated with the project will not result in increased emissions above ELs or ambient air impacts exceeding allowable TAP increments. This conclusion assumes that conditions in Table 1 are representative of facility design capacity or operations as limited by a federally enforceable permit condition. The DEQ permit writer should use Table 1 and other information presented in this memorandum to generate appropriate permit provisions/restrictions to assure emissions do not exceed applicable regulatory thresholds requiring further analyses and to assure the requirements of Appendix W are met regarding emissions representative of design capacity or permit allowable rates.

Summary of Submittals and Actions

- May 4, 2020: Application received by DEQ.
- May 7, 2020: Supplemental information received and regulatory start date.
- August 14, 2018: Application determined complete by DEQ.

Table 1. KEY ASSUMPTIONS USED IN MODELING ANALYSES	
Criteria/Assumption/Result	**Explanation/Consideration**
Criteria Pollutant Emission Rates. Facility-wide non-fugitive allowable emission rates of all criteria pollutants (from combined operations of the main plant and backup plant) are below levels defined as BRC.	A NAAQS compliance demonstration would be required for any criteria pollutant emissions above BRC levels. Applicable emissions are function of annual throughput and annual operational hours of boilers.
TAP Emission Sources. Increases in allowable emissions of TAPs are below ELs.	A TAP increment compliance demonstration would be required for any TAPs with emission increases above ELs.
Operations and Throughput. Air impact analyses were performed for emissions associated with: • a production rate of 250,000 yard^3/year from the main and backup CBP. • 2,988 hour/year for the 5.0 MMBtu/hour boiler and 3,332 hour/year for the 7.0 MMBtu/hour boiler.	Short term production or emission limits are not necessary to demonstrate compliance with NAAQS, provided annual production/emissions are limited to levels below BRC. An annual throughput restriction is also necessary to assure Carcinogenic TAP compliance.
Plant Setback Requirements from Site Boundary. This modification did not affect the existing setback requirement. The plant may be positioned anywhere on the INL site, provided a minimum setback distance of 70 meters (230 feet) is maintained between both the mixer/loadout release points and the ambient air boundary (boundary inside of which the permittee can legally and effectively control access by those not associated with the CBPs or having business with the CBPs).	Compliance with TAP increments is not assured if the CBPs are operated at a location where the distance between the emission points and the ambient air boundary is less than 70 meters. For compliance with AACCs, a roadway transecting the facility is not considered as ambient air.
Public Access Exclusion. Public (anyone not under the control of the permittee) access is legally and effectively precluded from areas inside the ambient air boundary.	Compliance with TAP increments is only assured if public access is precluded from areas inside this boundary. Roadways accessible by those not associated with the plant are considered as ambient air, except for AACC compliance where the roadway transects the facility.

2.0 Background Information

This section provides background information applicable to the project and the site proposed for the facility. It also provides a brief description of the applicable air impact analyses requirements for the project.

2.1 Project Description

The Champion project involves a primary stationary concrete batch plant (CBP) and a backup plant proposed for a location near the NRF on the INL site in eastern Idaho. Pollutant-emitting processes conducted at the CBP will include material handling of cement and aggregate and combustion of diesel

fuel in two boilers and an aggregate heater. The PTC addresses all air pollutant emitting activities associated with the CBPs.

2.2 Proposed Location and Area Classification

The CBPs are located on the INL site, within Butte county. This area is designated as an attainment or unclassifiable area for sulfur dioxide (SO_2), nitrogen dioxide (NO_2), carbon monoxide (CO), lead (Pb), ozone (O_3), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM_{10}), and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers ($PM_{2.5}$). The area is not classified as non-attainment for any criteria pollutants.

2.3 Air Impact Analyses Required for All Permits to Construct

Idaho Air Rules Sections 203.02 and 203.03:

> *No permit to construct shall be granted for a new or modified stationary source unless the applicant shows to the satisfaction of the Department all of the following:*
>
> ***02. NAAQS**. The stationary source or modification would not cause or significantly contribute to a violation of any ambient air quality standard.*
>
> ***03. Toxic Air Pollutants.** Using the methods provided in Section 210, the emissions of toxic air pollutants from the stationary source or modification would not injure or unreasonably affect human or animal life or vegetation as required by Section 161. Compliance with all applicable toxic air pollutant carcinogenic increments and toxic air pollutant non-carcinogenic increments will also demonstrate preconstruction compliance with Section 161 with regards to the pollutants listed in Sections 585 and 586.*

Atmospheric dispersion modeling, using computerized simulations, is used to demonstrate compliance with both NAAQS and TAPs. Idaho Air Rules Section 202.02 states:

> ***02. Estimates of Ambient Concentrations**. All estimates of ambient concentrations shall be based on the applicable air quality models, data bases, and other requirements specified in 40 CFR 51 Appendix W (Guideline on Air Quality Models).*

2.4 Significant Impact Level and Cumulative NAAQS Impact Analyses

If specific criteria pollutant emission increases associated with the proposed permitting project cannot qualify for a BRC exemption as per Idaho Air Rules Section 221, then the permit cannot be issued unless the application demonstrates that applicable emission increases will not cause or significantly contribute to a violation of NAAQS, as required by Idaho Air Rules Section 203.02.

The first phase of a NAAQS compliance demonstration is to evaluate whether the proposed facility/project could have a significant impact to ambient air. Section 3.1.1 of this memorandum describes the applicability evaluation of Idaho Air Rules Section 203.02. The Significant Impact Level (SIL) analysis for a new facility or proposed modification to a facility involves modeling estimated criteria air pollutant emissions from the facility or modification to determine the potential impacts to ambient air. Air impact analyses are required by Idaho Air Rules to be conducted in accordance with methods outlined in Appendix W. Appendix W requires that facilities be modeled using emissions and operations representative of design capacity or as limited by a federally enforceable permit condition.

A facility or modification is considered to have a significant impact on air quality if maximum modeled impacts to ambient air exceed the established SIL listed in Idaho Air Rules Section 006 (referred to as a "significant contribution" in Idaho Air Rules) or as incorporated by reference as per Idaho Air Rules Section 107.03.b. Table 2 lists the applicable SILs.

If modeled maximum pollutant impacts to ambient air from the emission sources associated with a new facility or modification exceed the SILs, then a cumulative NAAQS impact analysis is necessary to demonstrate compliance with NAAQS and Idaho Air Rules Section 203.02.

A cumulative NAAQS impact analysis for attainment area pollutants involves assessing ambient impacts (typically the design values consistent with the form of the standard) from facility-wide potential/allowable emissions, and emissions from any nearby co-contributing sources, and then adding a DEQ-approved background concentration value to the modeled result that is appropriate for the criteria pollutant/averaging-period at the facility location and the area of significant impact. The resulting pollutant concentrations in ambient air are then compared to the NAAQS listed in Table 2. Table 2 also lists SILs and specifies the modeled design value that must be used for comparison to the NAAQS. NAAQS compliance is evaluated on a receptor-by-receptor basis for the modeling domain.

If the cumulative NAAQS impact analysis indicates a violation of the standard, the permit may not be issued if the proposed project has a significant contribution (exceeding the SIL) to the modeled violation. If project-specific impacts are below the SIL, then the project does not have a significant contribution to the specific violations.

Compliance with Idaho Air Rules Section 203.02 is generally demonstrated if: a) applicable specific criteria pollutant emission increases are at a level defined as BRC, using the criteria established by DEQ regulatory interpretation[1]; or b) all modeled impacts of the SIL analysis are below the applicable SIL or other level determined to be inconsequential to NAAQS compliance; or c) modeled design values of the cumulative NAAQS impact analysis (modeling all emissions from the facility and co-contributing sources, and adding a background concentration) are less than applicable NAAQS at receptors where impacts from the proposed facility/modification exceeded the SIL or other identified level of consequence; or d) if the cumulative NAAQS analysis showed NAAQS violations, the impact of proposed facility/modification to any modeled violation was inconsequential (typically assumed to be less than the established SIL) for that specific receptor and for the specific modeled time when the violation occurred.

2.5 Toxic Air Pollutant Analyses

Emissions of toxic substances are generally addressed by Idaho Air Rules Section 161:

> *Any contaminant which is by its nature toxic to human or animal life or vegetation shall not be emitted in such quantities or concentrations as to alone, or in combination with other contaminants, injure or unreasonably affect human or animal life or vegetation.*

Permitting requirements for toxic air pollutants (TAPs) from new or modified sources are specifically addressed by Idaho Air Rules Section 203.03 and require the applicant to demonstrate to the satisfaction of DEQ the following:

> *Using the methods provided in Section 210, the emissions of toxic air pollutants from the stationary source or modification would not injure or unreasonably affect human or animal life or vegetation as required by Section 161. Compliance with all applicable toxic air pollutant*

carcinogenic increments and toxic air pollutant non-carcinogenic increments will also demonstrate preconstruction compliance with Section 161 with regards to the pollutants listed in Sections 585 and 586.

Table 2. APPLICABLE REGULATORY LIMITS

Pollutant	Averaging Period	Significant Impact Levels[a] ($\mu g/m^3$)[b]	Regulatory Limit[c] ($\mu g/m^3$)	Modeled Design Value Used[d]
PM_{10}[e]	24-hour	5.0	150[f]	Maximum 6th highest[g]
$PM_{2.5}$[h]	24-hour	1.2	35[i]	Mean of maximum 8th highest[j]
	Annual	0.2	12[k]	Mean of maximum 1st highest[l]
Carbon monoxide (CO)	1-hour	2,000	40,000[m]	Maximum 2nd highest[n]
	8-hour	500	10,000[m]	Maximum 2nd highest[n]
Sulfur Dioxide (SO_2)	1-hour	3 ppb[o] (7.8 $\mu g/m^3$)	75 ppb[p] (196 $\mu g/m^3$)	Mean of maximum 4th highest[q]
	3-hour	25	1,300[m]	Maximum 2nd highest[n]
	24-hour	5	365[m]	Maximum 2nd highest[n]
	Annual	1.0	80[r]	Maximum 1st highest[n]
Nitrogen Dioxide (NO_2)	1-hour	4 ppb (7.5 $\mu g/m^3$)	100 ppb[s] (188 $\mu g/m^3$)	Mean of maximum 8th highest[t]
	Annual	1.0	100[r]	Maximum 1st highest[n]
Lead (Pb)	3-month[u]	NA	0.15[r]	Maximum 1st highest[n]
	Quarterly	NA	1.5[r]	Maximum 1st highest[n]
Ozone (O_3)	8-hour	40 TPY VOC[v]	70 ppb[w]	Not typically modeled

a. Idaho Air Rules Section 006 (definition for significant contribution) or as incorporated by reference as per Idaho Air Rules Section 107.03.b.
b. Micrograms per cubic meter.
c. Incorporated into Idaho Air Rules by reference, as per Idaho Air Rules Section 107.
d. The maximum 1st highest modeled value is always used for the significant impact analysis unless indicated otherwise. Modeled design values are calculated for each ambient air receptor.
e. Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers.
f. Not to be exceeded more than once per year on average over 3 years.
g. Concentration at any modeled receptor when using five years of meteorological data.
h. Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers.
i. 3-year mean of the upper 98th percentile of the annual distribution of 24-hour concentrations.
j. 5-year mean of the 8th highest modeled 24-hour concentrations at the modeled receptor for each year of meteorological data modeled. For the SIL analysis, the 5-year mean of the 1st highest modeled 24-hour impacts at the modeled receptor for each year.
k. 3-year mean of annual concentration.
l. 5-year mean of annual averages at the modeled receptor.
m. Not to be exceeded more than once per year.
n. Concentration at any modeled receptor.
o. Interim SIL established by EPA policy memorandum.
p. 3-year mean of the upper 99th percentile of the annual distribution of maximum daily 1-hour concentrations.
q. 5-year mean of the 4th highest daily 1-hour maximum modeled concentrations for each year of meteorological data modeled. For the significant impact analysis, the 5-year mean of 1st highest modeled 1-hour impacts for each year is used.
r. Not to be exceeded in any calendar year.
s. 3-year mean of the upper 98th percentile of the annual distribution of maximum daily 1-hour concentrations.
t. 5-year mean of the 8th highest daily 1-hour maximum modeled concentrations for each year of meteorological data modeled. For the significant impact analysis, the 5-year mean of maximum modeled 1-hour impacts for each year is used.
u. 3-month rolling average.
v. An annual emissions rate of 40 ton/year of VOCs is considered significant for O_3.
w. Annual 4th highest daily maximum 8-hour concentration averaged over three years.

Per Section 210, if the total project-wide emission increase of any TAP associated with a new source or modification exceeds screening emission levels (ELs) of Idaho Air Rules Section 585 or 586, then the ambient impact of the emission increase must be estimated. If ambient impacts are less than applicable Acceptable Ambient Concentrations (AACs) for non-carcinogens of Idaho Air Rules Section 585 and Acceptable Ambient Concentrations for Carcinogens (AACCs) of Idaho Air Rules Section 586, then compliance with TAP requirements has been demonstrated.

Idaho Air Rules Section 210.20 states that if TAP emissions from a specific source are regulated by the Department or EPA under 40 CFR 60, 61, or 63, then a TAP impact analysis under Section 210 is not required for that TAP. The DEQ permit writer evaluates the applicability of specific TAPs to the Section 210.20 exclusion.

3.0 Analytical Methods and Data

This section describes the methods and data used in analyses to demonstrate compliance with applicable air quality impact requirements. The DEQ Statement of Basis provides a discussion of the methods and data used to estimate criteria and TAP emission rates.

Facility-wide emissions of criteria pollutants and TAP emission increases resulting from operation of the Champion CBPs were calculated by DEQ for various applicable averaging periods. The calculation of potential emissions is the responsibility of the DEQ permit writer, and the representativeness and accuracy of emission estimates is not addressed in this modeling memorandum. DEQ air impact analysts are responsible for assessing the requirements to perform air impact modeling and assuring that potential emission rates provided in the emission inventory are properly used in the model. The rates listed must represent the maximum allowable rate as averaged over the specified period.

Emission rates used in the impact modeling applicability analyses and any modeling analyses, as listed in this memorandum, should be reviewed by the DEQ permit writer and compared with those in the final emission inventory. All modeled criteria air pollutant and TAP emission rates must be equal to or greater than the facility's potential emissions calculated in the PTC emission inventory or proposed permit allowable emission rates.

3.1 Modeling Applicability and Modeled Criteria Pollutant Emission Rates

If project-specific emission increases for criteria pollutants would qualify for a BRC permit exemption as per Idaho Air Rules Section 221 if it were not for potential emissions of one or more pollutants exceeding the BRC threshold of 10 percent of emissions defined by Idaho Air Rules as significant, then a NAAQS compliance demonstration may not be required for those pollutants with emissions below BRC levels. DEQ's regulatory interpretation policy of exemption provisions of Idaho Air Rules is that: "A DEQ NAAQS compliance assertion will not be made by the DEQ modeling group for specific criteria pollutants having a project emissions increase below BRC levels, provided the proposed project would have qualified for a Category I Exemption for BRC emissions quantities except for the emissions of another criteria pollutant.[1]" The interpretation policy also states that the exemption criteria of uncontrolled potential to emit (PTE) not to exceed 100 ton/year (Idaho Air Rules Section 220.01.a.i) is not applicable when evaluating whether a NAAQS impact analyses is required. A permit will be issued limiting PTE below 100 ton/year, thereby negating the need to maintain calculated uncontrolled PTE under 100 ton/year. The BRC exemption cannot be used to exempt a project from a pollutant-specific NAAQS compliance demonstration in most cases where a PTC is required for the action regardless of emission quantities, such as the modification of an existing emission or throughput limit.

A NAAQS compliance demonstration must be performed for pollutant increases that would not qualify for the BRC exemption from the requirement to demonstrate compliance with NAAQS. The Champion CBPs emission inventory indicates that facility-wide post-project controlled allowable emissions of specific non-fugitive criteria pollutants are below BRC levels, as listed in Table 3. Only non-fugitive emissions are considered in permit applicability (as specified in the definition of *Stationary Source* in

Idaho Air Rules Section 006.121) and, correspondingly, in the applicability of NAAQS compliance demonstration requirements. Therefore, emissions from cement storage silo filling, fly ash storage silo filling, the weigh hopper loading baghouse, the main plant mixer baghouse, the backup plant truck loadout, boilers, and the aggregate heater were the only emission sources considered in the evaluation of whether a NAAQS compliance demonstration is required for permit issuance. This inventory was based on the requested annual concrete production of 250,000 $yard^3$/year.

Table 3. CRITERIA POLLUTANT NAAQS COMPLIANCE DEMONSTRATION APPLICABILITY

Criteria Pollutant	BRC Level (ton/year)	Applicable Facility Wide PTE Emissions (ton/year)	Air Impact Analyses Required?
PM_{10} [a]	1.5	<0.3	No
$PM_{2.5}$ [b]	1.0	<0.6	No
Carbon Monoxide (CO)	10.0	<0.7	No
Sulfur Dioxide (SO_2)	4.0	<0.1	No
Nitrogen Oxides (NOx)	4.0	<2.8	No
Lead (Pb)	0.06	<0.01	No
Volatile Organic Compounds (VOCs)	4.0	<0.1	No

a. Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers.
b. Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers.

Site-specific air impact modeling analyses may not be necessary for some pollutants, even where such emissions do not qualify for the BRC exemption. DEQ has developed modeling applicability thresholds, below which a site-specific modeling analysis is not required. DEQ generic air impact modeling analyses that were used to develop the modeling thresholds provide a conservative SIL analysis for projects with emissions below identified threshold levels. Project-specific modeling applicability thresholds are provided in the *Idaho Air Modeling Guideline*[2]. These thresholds were based on assuring an ambient impact of less than the established SIL for specific pollutants and averaging periods.

If total project-specific emission rate increases of a pollutant are below Level I Modeling Applicability Thresholds, then project-specific air impact analyses are not necessary for permitting. Use of Level II Modeling Applicability Thresholds are conditional, requiring DEQ approval. DEQ approval is based on dispersion-affecting characteristics of the emission sources such as stack height, stack gas exit velocity, stack gas temperature, distance from sources to ambient air, presence of elevated terrain, and potential exposure to sensitive public receptors.

DEQ analyses performed by the permit writer concluded that facility-wide emissions of all criteria pollutants were below BRC thresholds at the post-project requested production limit of 250,000 $yard^3$/year and requested operational rates of boilers, and a NAAQS compliance demonstration was therefore not required for permit issuance. A comparison of emissions with modeling applicability thresholds was not necessary since NAAQS compliance demonstrations were not required by Idaho Air Rules Section 203.02.

Ozone (O_3) differs from other criteria pollutants in that it is not typically emitted directly into the atmosphere. O_3 is formed in the atmosphere through reactions of VOCs, NOx, and sunlight. Atmospheric dispersion models used in stationary source air permitting analyses cannot be used to estimate O_3 impacts resulting from VOC and NOx emissions from an industrial facility. O_3

concentrations resulting from area-wide emissions are predicted by using more complex airshed models such as the Community Multi-Scale Air Quality (CMAQ) modeling system. Use of the CMAQ model is very resource intensive and DEQ asserts that performing a CMAQ analysis for a particular permit application is not typically a reasonable or necessary requirement for air quality permitting. Addressing secondary formation of O_3 within the context of permitting a new stationary source has been somewhat addressed in EPA regulation and policy. As stated in a letter from Gina McCarthy of EPA to Robert Ukeiley, acting on behalf of the Sierra Club (letter from Gina McCarthy, Assistant Administrator, United States Environmental Protection Agency, to Robert Ukeiley, January 4, 2012):

> *. . . footnote 1 to sections 51.166(I)(5)(I) of the EPA's regulations says the following: "No de minimis air quality level is provided for ozone. However, any net emission increase of 100 tons per year or more of volatile organic compounds or nitrogen oxides subject to PSD would be required to perform an ambient impact analysis, including the gathering of air quality data."*
>
> *The EPA believes it unlikely a source emitting below these levels would contribute to such a violation of the 8-hour ozone NAAQS, but consultation with an EPA Regional Office should still be conducted in accordance with section 5.2.1.c. of Appendix W when reviewing an application for sources with emissions of these ozone precursors below 100 TPY."*

DEQ determined it was not appropriate or necessary to require a quantitative source specific O_3 impact analysis because allowable emission estimates of VOCs and NOx are below the 100 tons/year threshold. Additionally, both VOC and NOx emissions satisfied BRC exemption criteria.

3.2 TAPs Modeling Applicability

TAP emission regulations under Idaho Air Rules Section 210 are only applicable for new or modified sources constructed after July 1, 1995. DEQ evaluated the TAP emission increase resulting from the proposed annual production increase for TAP impact modeling analyses requirement. Emission increases were below applicable ELs of Idaho Air Rules Section 586. Since emission increases were below ELs, impact modeling analyses demonstrating that impacts are below applicable ambient increment standards expressed in Idaho Air Rules Section 585 and 586 (as AACs and AACCs) were not required.

4.0 Conclusions

The information submitted with the PTC application, combined with DEQ air impact analyses, demonstrated to DEQ's satisfaction that emissions from the Champion CBPs will not cause or significantly contribute to a violation of any applicable ambient air quality standard or TAP increment.

References

1. *Policy on NAAQS Compliance Demonstration Requirements.* Idaho Department of Environmental Quality Policy Memorandum. July 11, 2014.

2. State of Idaho Guideline for Performing Air Quality Impact Analyses. Idaho Department of Environmental Quality. September 2013. State of Idaho DEQ Air Doc. ID AQ-011. Available at http://www.deq.idaho.gov/media/1029/modeling-guideline.pdf.

APPENDIX C – FACILITY DRAFT COMMENTS

The following comments were received from the facility on July 17, 2020:

Facility Comment: In Table 1.1 in the permit change 200,000 cubic yards per year to 250,000 cubic yards per year.

DEQ Response: The cubic yards per year have been changed to 250,000 in Table 1.1 of the permit.

APPENDIX D – PROCESSING FEE

PTC Processing Fee Calculation Worksheet

Instructions:
Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company:	**Champion Concrete, Inc.**
Address:	**43 38' 56.81" N, 112 54' 30.59" W**
City:	**Idaho Falls**
State:	**Idaho**
Zip Code:	**83402**
Facility Contact:	**Dean Van Loon**
Title:	**Vice President**
AIRS No.:	**327320**

Y	Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
Y	Did this permit require engineering analysis? Y/N
N	Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO_X	5.4	0	5.4
SO_2	0.1	0	0.1
CO	1.4	0	1.4
PM10	0.9	0	0.9
VOC	0.2	0	0.2
Total:	7.9	0	**7.9**
Fee Due	**$ 500.00**		

Comments: