

Statement of Basis

**Permit to Construct No. P-2013.0024
Project ID 61178**

**Staker Parson Co. dba Idaho Concrete
00398**

Facility ID 777-00398

Final

August 2, 2013
Robert Baldwin 
Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

| | |
|------------------|--|
| CFR | Code of Federal Regulations |
| CO | carbon monoxide |
| CO ₂ | carbon dioxide |
| DEQ | Department of Environmental Quality |
| EPA | U.S. Environmental Protection Agency |
| HAP | hazardous air pollutants |
| IDAPA | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| MACT | Maximum Achievable Control Technology |
| NAAQS | National Ambient Air Quality Standard |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NO ₂ | nitrogen dioxide |
| NO _x | nitrogen oxides |
| NSPS | New Source Performance Standards |
| O&M | operation and maintenance |
| PC | permit condition |
| PERF | Portable Equipment Relocation Form |
| PM | particulate matter |
| PM ₁₀ | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers |
| PSD | Prevention of Significant Deterioration |
| PTC | permit to construct |
| PTE | potential to emit |
| PW | process weight rate |
| <i>Rules</i> | <i>Rules for the Control of Air Pollution in Idaho</i> |
| 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/hr | tons per hour |
| T/yr | tons per consecutive 12 calendar month period |
| VOC | volatile organic compounds |
| yd ³ | cubic yards |

FACILITY INFORMATION

Description

This facility consists of two cone crushers and three screens for the purpose of crushing rock and sorting the rock into various sizes. The crushers and the screens were manufactured after August 31, 1983. These sources are subject to the regulations of 40 CFR 60 subpart OOO. This facility has previously been operating with a Permit by Rule issued on February 17, 2007. This facility will be operated using line power only.

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).

February 17, 2007 PR-2007.0013, Permit by Rule for rock crushing equipment, Permit status A, but will become S upon issuance of this permit)

Application Scope

This permit is the initial PTC for this facility.

The applicant has proposed to:

- Convert the Permit by Rule registration issued on February 17, 2007, to a Permit to Construct to allow the facility to remain in a location longer than a twelve month period.

Application Chronology

| | |
|------------------------------|---|
| April 4, 2013 | DEQ received an application |
| April 5, 2013 | DEQ received the application fee. |
| April 22, 2013 – May 7, 2013 | DEQ provided an opportunity to request a public comment period on the application and proposed permitting action. |
| May 3, 2013 | DEQ determined that the application was complete. |
| June 27, 2013 | DEQ made available the draft permit and statement of basis for peer and regional office review. |
| July 2, 2013 | DEQ made available the draft permit and statement of basis for applicant review. |
| June 6, 2013 | DEQ received the permit processing fee. |
| August 2, 2013 | DEQ issued the final permit and statement of basis. |

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

| Sources | |
|---|--|
| Rock Crushing Plant: Nordbert Cone Crusher Serial No. 41-3151 Capacity (T/yr): 500 Year Manufactured : 1988 | JCI/EIJay Screen Deck Serial No.: 43-3159 Size (ft): 5 X 16 Number of Decks: 3 Year Manufactured: 1999 |
| Sandvik Cone Crusher Serial No. 41-3154 Capacity (T/yr): 500 Year Manufactured : 2005 | SI-Russ Screen Deck Serial No.: 43-3150 Size (ft): 6 X 16 Number of Decks: 2 Year Manufactured: 1990 |
| Simplicity Screen Deck Serial No.: 41-3156 Size (ft): 6 X 20 Number of Decks: 3 Year Manufactured: 1997 | |

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.

This facility has been permitted to operate under the issuance of a Permit by Rule (PBR). The PBR rules do not set an emissions limit of pound per hour, pounds per day or even tons per year. The emissions for a facility with a PBR are set by specific equipment and the opacity that is observed leaving the equipment while in operation. The equipment at this facility is subject to the opacity limits set in 40 CFR 60 subpart OOO as determined by the equipment's manufactured date.

40 CFR 60 subpart OOO has set the opacity limits of 15% and 10 % for the equipment subject to subpart OOO. For all other fugitive emission sources the opacity limit is set at 20%.

AMBIENT AIR QUALITY IMPACT ANALYSES

The rock crushing plant will operate with line power only, and under the same opacity limitations required by the Permit by Rule. There is no increase in emissions thus not modeling is required.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

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

The rock crushing plant has a facility classification for a minor source as 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 facility to remain in the same location longer than 12 calendar months. 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 58.01.01.625 Visible Emissions

The sources of PM₁₀ emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.4.1, 2.4.2, and 2.4.3.

Standards for New Sources (IDAPA 58.01.01.676)

IDAPA 58.01.01.676 Standards for New Sources

The facility has not fuel burning equipment. The facility is powered by line power, thus the fuel burning equipment standards do not apply.

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

IDAPA 58.01.01.701 Particulate Matter – New Equipment Process Weight Limitations

The process weight limitation do not apply because the more restrictive opacity limitation sets a particulate emissions rate far lower than the process weight limit calculations.

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 PM₁₀, SO₂, NO_x, CO, and VOC 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 52.21Prevention 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)

This facility is subject to 40 CFR 60 subpart OOO. The facility operates equipment that was manufactured after August 31, 1983. The equipment was not manufactured after April 22, 2008 and is not subject to the more restrictive opacity limits for the crusher and the screen and transfer conveyors.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

The facility is not subject to any MACT standards in 40 CFR Part 63.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action. The word added was chosen since this is an initial PTC but the permit conditions were established within the Permit by Rule issues on February 17, 2007.

Permit Condition 2.3

The Permit by Rule established the fugitive emission limits thus these limit have been added to this Permit to Construct.

Permit Condition 2.4

The Permit by Rule established the opacity limits on the fugitive emissions and the specific emission producing operations. Table 3 of 40 CFR 60 subpart OOO apply to all fugitive emissions from affected facilities without capture systems and for fugitive emissions escaping capture systems.

Permit Condition 2.5

The applicant stated the facility would be operating on line power only, thus not generator will be located at the facility.

Permit Condition 2.6

This monitoring requirement defines the frequency and the recording of visible emissions to determine compliance with the permit.

Permit Condition 2.7

This permit establishes the procedures required to determine compliance with the opacity limits stated within the permit.

Permit Condition 2.8

This permit condition establishes the determination to be made if or when the facility wishes to replace a piece of equipment with an equivalent piece of equipment that would not result with an increase of any emissions.

Permit Condition 2.9

The permit condition establishes the reporting that is required to be submitted when a piece of equipment was replaced.

General Provisions

Initial Permit Condition 3.1

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

Initial Permit Condition 3.2

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 3.3

The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

Initial Permit Condition 3.4

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

Initial Permit Condition 3.5

The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

Initial Permit Condition 3.6

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

Initial Permit Condition 3.7

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

Initial Permit Condition 3.8

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

Initial Permit Condition 3.9

The performance test report provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

Initial Permit Condition 3.10

The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 3.11

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

Initial Permit Condition 3.12

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

Initial Permit Condition 3.13

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

Initial Permit Condition 3.14

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

Initial Permit Condition 3.15

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

Initial Permit Condition 3.16

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04.

APPENDIX A – EMISSIONS INVENTORIES

Potential to Emit

Based on a Maximum Throughput of 500Tons per Hour

| Source | AP-42 Emission Factors Lb/Ton | PM₁₀ Emissions Tons/Year |
|------------------------|--|--|
| Nordber Cone Crusher | 0.0012 | 2.63 |
| Sandvik Cone Crusher | 0.0012 | 2.63 |
| Simplicity Screen Deck | 0.0043 | 9.42 |
| JCI/ELJay Screen Deck | 0.0043 | 9.42 |
| SI-Russ Screen Deck | 0.0043 | 9.42 |
| TOTAL | | 33.52 |

APPENDIX B – AMBIENT AIR QUALITY IMPACT ANALYSES

Modeling was not required for this permitting action.

APPENDIX C – FACILITY DRAFT COMMENTS

The following comments were received from the facility on July 12, 2013:

Facility Comment: Thank you for the opportunity to review this draft permit. I had one comment: Section 2.6 Monitoring Requirements. Requiring a full 30 minute VEO on each piece of equipment once per week is a severe restriction. Complying with this will require an employee to be entirely dedicated to this single task for 2.5 hours or more each week. As these aggregate plants are operated with a minimum crew and each minute of the shift is accounted for, requiring 2.5 hours of employee time each week is extremely burdensome. I would prefer to limit the weekly monitoring to the weekly facility wide inspection detailed under 2.3.4.

DEQ Response: DEQ has changed these permit conditions to read as follows:

2.3.4 The permittee shall conduct weekly facility-wide inspection of potential sources of visible fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. The inspection shall consist of a see/no see evaluation for each potential source of visible fugitive emissions. If any visible fugitive emissions are present from any source of fugitive emissions, the permittee shall take appropriate corrective action as expeditiously as practicable to mitigate the visible fugitive emissions.

2.6 Monitoring Requirement

The permittee shall maintain records of the results of each see/no see evaluation of visible fugitive emissions inspection. The records shall include, at a minimum, the date and results of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible fugitive emissions are present (if observed), any corrective action taken in response to the visible fugitive emissions, and the date corrective action was taken.

APPENDIX D – PROCESSING FEE

On June 6, 2013, the facility paid the processing fee of \$250.00.