Statement of Basis

Permit to Construct No. P-2019.0002
Project ID 62159

Staker Parson dba Idaho Concrete 00113
Portable, currently located in
Caldwell, Idaho

Facility ID 777-00113

Final

February 27, 2019
Shawnee Chen, P.E.
Senior Air Quality Engineer

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
BMP  best management practices
CAA  Clean Air Act
CFR  Code of Federal Regulations
CO  carbon monoxide
CO₂ carbon dioxide
CO₂e CO₂ equivalent emissions
CBP  concrete batch plant
DEQ  Department of Environmental Quality
EL  screening emission levels
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
lb/hr pounds per hour
MACT Maximum Achievable Control Technology
NAAQS National Ambient Air Quality Standard
NESHAP National Emission Standards for Hazardous Air Pollutants
NO₂ nitrogen dioxide
NOₓ nitrogen oxides
NSPS New Source Performance Standards
O&M operation and maintenance
PERF Portable Equipment Relocation Form
PM particulate matter
PM₂.₅ particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM₁₀ 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
Rules Rules for the Control of Air Pollution in Idaho
scf standard cubic feet
SIP State Implementation Plan
SO₂ sulfur dioxide
SOₓ sulfur oxides
T/yr tons per consecutive 12 calendar month period
T2 Tier II operating permit
TAP toxic air pollutants
µg/m³ micrograms per cubic meter
VOC volatile organic compounds
yd³ cubic yards
FACILITY INFORMATION

Description
Staker Parson Companies dba Idaho Concrete 00113 is a portable central concrete batch plant. The facility produces concrete by mixing cement, sand, and aggregate according to the specifications of their customers.
Line power is 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).

December 3, 2013  T2-2013.0050 project 61257 was renewed with no changes. Permit status (A, but will become S upon issuance of this permit).
August 5, 2008  Tier II Operating Permit and Permit to Construct (T2/PTC) T2-2008.0071, a renewal of the 2003 Tier II Operating Permit, Permit status (S).
July 8, 2003  Tier II Operating Permit No. T2-020032, limiting PM$_{10}$ emissions in accordance with Northern Ada County Maintenance Plan (S)
August 7, 2002  PTC 777-00113, Name change from Monroc to Idaho Concrete Co., Permit status (S)
August 3, 2000  PTC 777-00113, PTC modification to allow operating in attainment and nonattainment areas, Permit status (S)
January 23, 1995  PTC 777-00113, PTC modification to increase throughput and emissions limits, Permit status (S)
November 17, 1994  PTC 777-00113, Initial PTC issued, Permit status (S)

Application Scope
The applicant has agreed to convert their Tier II operating permit (T2) to a Permit to Construct (PTC) and has paid a PTC application fee.

This facility is identified in 40 CFR 52.670(d), Subpart N in the Northern Ada County PM$_{10}$ Maintenance Plan, and all applicable requirements from the Maintenance Plan of the State Implementation Plan (SIP) have been incorporated into this permit and remain in updated form by this permitting action (i.e., permit conditions: 2.1 through 2.8 and permit conditions 3.1 through 3.8) A copy of the relevant SIP is included in Appendix A.

Application Chronology

December 27, 2018  DEQ received an application.
January 8, 2019  DEQ received an application fee.
January 18, 2019  DEQ determined that the application was complete.
January 25, 2019  DEQ made available the draft permit and statement of basis for peer and regional office review.
February 1, 2019  DEQ made available the draft permit and statement of basis for applicant review.
February 22, 2019  DEQ received the permit processing fee.
February 27, 2019  DEQ issued the final permit and statement of basis.

**TECHNICAL ANALYSIS**

**Emissions Units and Control Equipment**

<table>
<thead>
<tr>
<th>Source ID No.</th>
<th>Sources(a)</th>
<th>Control Equipment</th>
<th>Source ID No.</th>
<th>Sources(a)</th>
<th>Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Materials Handling</td>
<td>Material Transfer Points: Materials handling Concrete aggregate transfers Truck unloading of aggregate Aggregate conveyor transfers Aggregate handling</td>
<td>Fugitive best management practices (BMP)</td>
<td>Concrete Batch Plant</td>
<td>Manufacturer: Vince Hagan Model: VHASS Manufacture Date: 1986 Rated Production Capacity: 260 yd³/hr Permitted/Proposed Max. Production Rate: 600,000 yd³/yr</td>
<td>Weigh Batcher Baghouse Exhaust: Exit height: 25 ft (7.62 m) Exit diameter: 2.5 ft (0.76 m) Exit flow rate: 140 acfm Exit temperature: ambient</td>
</tr>
<tr>
<td>Boiler</td>
<td>Boiler: Manufacturer: Rockmills Model: 00-400 Manufacture Date: prior to 2004 Maximum Fuel Feed Rate: 30 gal/hr (~4.1 MMbtu/hr) Fuel: distillate fuel oil</td>
<td>N/A</td>
<td>Boiler Exhaust: Exit height: 25 ft (7.6 m) Exit diameter: 1.7 ft (0.51 m) Exit temperature: 350 °F (177 °C)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(a) This table lists emission units present at the facility as listed by the applicant in their permit application.

(b) The cement and fly ash storage silo baghouses are process equipment as they are part of the physical and operational design of the silos. PM10 controlled emission factors were used when determining Potential to Emit.

**Emission Inventories**

This permitting action is to convert the existing Tier II operation permit to a PTC. An increase in emissions or a physical change in the method of operation of permitted emission sources has not been proposed, therefore, no new emissions inventory is required.

**Ambient Air Quality Impact Analyses**

Because an increase in emissions was not proposed for this project, modeling is not 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$_{2.5}$, PM$_{10}$, SO$_2$, NO$_2$, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

This facility is identified in 40 CFR 52.670(d), Subpart N in the Northern Ada County PM10 Maintenance Plan, and all applicable requirements from the Maintenance Plan of the State Implementation Plan (SIP) have been incorporated into this permit and remain in updated form by this permitting action (i.e., permit conditions: 2.1 through 2.8 and permit conditions 3.1 through 3.8) A copy of the relevant SIP is included in Appendix A.

Facility Classification

This permitting action is to convert the existing Tier II operation permit to a PTC. An increase in emissions or a physical change in the method of operation of permitted emission sources has not been proposed, therefore, no new emissions inventory is required. The facility classification remains unchanged.

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 this facility. 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.

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 PM$_{10}$, SO$_2$, NO$_x$, CO, and VOC, and 10 tons per year for any one HAP or 25 tons per year for all HAP combined. 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 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)

Non-applicability

The Rockmills boiler is not subject to Subpart Db—Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units because the boiler’s heat input capacity (i.e., 4.1 MMBtu/hr) is below 100 MMBtu/hr to be subject to the subpart.
The Rockmills boiler is not subject to Subpart De—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units because the boiler’s heat input capacity (i.e., 4.1 MMbtu/hr) is below 10 MMbtu/hr to be subject to the subpart.

**NESHAP Applicability (40 CFR 61)**

The facility is not subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements in 40 CFR 61.

**MACT/GACT Applicability (40 CFR 63)**

The facility’s distillate fuel oil-fired Rockmills boiler is subject to federal requirements in 40 CFR 63 Subpart JJJJJJ even though the requirements are not specifically included in the permit. As mentioned in the January 25, 2019 email from the applicant, the facility has plans to upgrade the boiler within the next year. If the replacement is a natural gas-fired boiler, then the natural gas-fired boiler won’t be subject to the following requirements. This is another reason why the following requirements are not specifically included in the permit.

**Applicable**

Subpart JJJJJJ—National Emission Standards 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 boiler at the facility meets the definition of industrial boiler. The facility is an area source of HAP. Therefore, the boiler is subject to this subpart._

§63.11194 What is the affected source of this subpart?

(1) The affected source of this subpart is the collection of all existing industrial, commercial, and institutional boilers within a subcategory, as listed in §63.11200 and defined in §63.11237, located at an area source.

(b) An affected source is an existing source if you commenced construction or reconstruction of the affected source on or before June 4, 2010.

_The boiler is an existing source as it is an existing industrial boiler installed before June 4, 2010._

§63.11196 What are my compliance dates?

(1) If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management practice standard no later than March 21, 2014.

(2) If the existing affected boiler is subject to emission limits, you must achieve compliance with the emission limits no later than March 21, 2014.

(3) If the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014.

_The boiler is not subject to any emissions limits listed in Table 1._

_The boiler is subject to work practice standards listed in Table 2. The compliance date for this boiler is March 21, 2014._

§63.11201 What standards must I meet?

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

| 12. Existing oil-fired boilers with heat input capacity of equal to or less than 5 MMBtu/hr | Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler every 5 years as specified in §63.11223. |

The boiler is an existing industrial oil-fired boiler with heat input capacity less than 5 MMBtu/hr and is subject to boiler turn-up work practice standards.

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

(c) For existing affected boilers that have applicable work practice standards, management practices, or emission reduction measures, you must demonstrate initial compliance no later than the compliance date that is specified in §63.11196 and according to the applicable provisions in §63.7(a)(2), except as provided in paragraph (j) of this section.

The boiler is subject to boiler turn-up work practice standard and must demonstrate initial compliance no later than March 21, 2014.

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

(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.

The boiler is subject to the requirement.

§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.

(e) Oil-fired boilers with a heat input capacity of equal to or less than 5 million Btu per hour must conduct a tune-up every 5 years as specified in paragraphs (b)(1) through (7) of this section. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed oil-fired boiler with a heat input capacity of equal to or less than 5 million Btu per hour, the first 5-year tune-up must be no later than 61 months after the initial startup. You may delay the burner inspection specified in paragraph (b)(1) of this section and inspection of the system controlling the air-to-fuel ratio specified in paragraph (b)(3) of this section until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months.

The boiler is subject to the requirements.

§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.

(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.

(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.

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

(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.

(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.

The boiler is subject to the requirements.

§63.11235 What parts of the General Provisions apply to me?

Table 8 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

The boiler is subject to the requirements.

Permit Conditions Review

This section describes only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

PERMIT SCOPE

Permit Condition 1.1 states the scope of this permitting action: converting an existing Tier II operating permit to a PTC.

Permit Condition 1.2 states that this PTC replaces Tier II Operating Permit No. T2-2013.0050, issued on December 10, 2013.

Table 1.1 is taken from the existing Tier II operating permit. The footnote is taken from the current template for a concrete batch plant (CBP).
FACILITY-WIDE CONDITIONS

Facility-wide permit conditions are taken from the existing Tier II operating permit and are updated using the current CBP template language. Permit Conditions 2.6 and 2.9 regarding relocation are new and are taken from the current CBP permit template.

Permit Condition 2.8 is part of the SIP (i.e., Permit Condition 2.5 of the 2003 SIP permit) and is updated using the current template language.

Open Burning permit condition is removed as it is not in the CBP template. Obligation to Comply permit condition is removed as it is now in the permit letter. Reports and Certifications permit condition is removed as it is now General Provisions 4.10.

CONCRETE BATCH PLANT EQUIPMENT

All permit conditions and Table 3.1 in this section are taken from the existing Tier II operating permit.

GENERAL PROVISIONS

General provisions are updated using the ones taken from the current CBP template.

SIP

General Provisions 4.10, Permit Conditions 2.8, 3.3, 3.4, 3.6, 3.7, and 3.8, and Table 3.1 are part of the SIP and are carried forward from the existing Tier II operating permit to the PTC.

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 – State Implementation Plan Conditions

PART 52—[AMENDED]

1. The authority citation for Part 52 continues to read as follows:
Authority: 42 U.S.C. 7401 et seq.

Subpart N—Idaho

2. Section 52.670 is amended by adding paragraph (c)(38) to read as follows:

§ 52.670
Identification of plan.

(c) ***

(38) The Idaho Department of Environmental Quality (Idaho DEQ, the State, or Idaho) submitted a PM10 maintenance plan and redesignation request for the Ada County/Boise, Idaho area on September 27, 2002, and provided supplemental information on July 10, 2003 and July 21, 2003.

(i) Incorporation by reference.

(A) The following terms and conditions limiting particulate matter emissions in the following permits:

(1) State of Idaho Air Pollution Operating Permit for LP Wood Polymers, Inc. Permit No. 001-00115, issued July 12, 2002, the following conditions: 1.1, 1.3, 3.1, and the Appendix.

(2) State of Idaho Air Pollution Operating Permit for Consolidated Concrete Company, Permit No. 001-00046, issued December 03, 2001, the following conditions: 1.1, 1.3, 2.3, 3.1, 3.2, and the Appendix. Start Printed Page 61110

(3) State of Idaho Air Pollution Operating Permit for Crookham Company, Permit No. 027-00020, issued January 18, 2002, the following conditions: 1.1, 1.3, 2.1, 2.3, 3.1, 3.1.1, 3.1.2, 3.2, and the Appendix.

(4) State of Idaho Air Pollution Operating Permit for Double D Service Center, Permit No. 001-00168, issued February 4, 2002, the following conditions: 1.1, 1.3, 3.1, 3.2.1, 3.2.2, 3.2.3, and the Appendix.

(5) State of Idaho Air Pollution Operating Permit for Plum Creek Northwest Lumber, Inc., Permit No. 001-00091, issued July 12, 2002, the following conditions: 1.1, 1.3, 2.1.2, 3.1, and the Appendix.

(6) State of Idaho Air Pollution Operating Permit for C. Wright Construction, Inc., Permit No. T2-000033, issued July 08, 2003, the following conditions: 2 (heading only), 2.5, (2.12, Table 2.2 as it applies to PM10), 2.14, 3 (heading only), 3.3, Table 3.2, 3.4, 3.5, 3.6, 3.7, 3.8, 3.10, 4 (heading only), 4.2, 4.3, 4.4, 4.7, 5, and Table 5.1.

(7) State of Idaho Air Pollution Operating Permit for Nelson Construction Co., Permit No. T2-020029, issued July 21, 2003, the following conditions: 2 (heading only), 2.12, 2.14, 3 (heading only, 3.3, 3.4, 3.6, 3.7, 3.9, 3.10, 3.11, 3.12, 4 (heading only), 4.3, 4.4, 4.5, 4.6, 5, and Table 5.1.

(8) State of Idaho Air Pollution Operating Permit for Mike's Sand and Gravel, Permit No. 001-00184, issued July 12, 2002, the following conditions: 1.1, 1.3, 2.2.1, 3.1, and the Appendix.
(9) State of Idaho Air Pollution Operating Permit for Idaho Concrete Co., Permit No. T2-020031, issued July 8, 2003, the following conditions: 2 (heading only), 2.5, 2.13, 3 (heading only), 3.3, 3.4, 3.6, 3.7, 3.8, 4 (heading only), and Table 4.1.

10) State of Idaho Air Pollution Operating Permit for Idaho Concrete Co., Permit No T2–020032, issued July 8, 2003, the following conditions: 2 (heading only), 2.5, 2.13, 3 (heading only), 3.3, 3.4, 3.6, 3.7, 3.8, 4 (heading only), and Table 4.1.

(11) State of Idaho Air Pollution Operating Permit for Idaho Concrete Co., Permit No. T2–020033, issued July 8, 2003, the following conditions: 2 (heading only), 2.5, 2.13, 3 (heading only), 3.3, 3.4, 3.6, 3.7, 3.8, 4 (heading only), and Table 4.1.
Appendix B – 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: Staker & Parson dba Idaho Concrete 00151
Address: 2350 S 1900 W
City: Ogden
State: UT
Zip Code: 84401
Facility Contact: Patrick Clark
Title: Environmental Advisor
AIRS No.: 777-00113

<table>
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<tr>
<th>Pollutant</th>
<th>Annual Emissions Increase (T/yr)</th>
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</tr>
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Fee Due: $1,000.00

Comments: T2 to PTC conversion required research into the North Ada County PM\textsubscript{10} SIP, old permit emissions inventory and modeling.