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.
# TABLE OF CONTENTS

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE ........................................................................... 3

FACILITY INFORMATION ..................................................................................................................... 5
- Description ........................................................................................................................................ 5
- Permitting History ............................................................................................................................. 5
- Application Scope ............................................................................................................................. 5
- Application Chronology .................................................................................................................... 5

TECHNICAL ANALYSIS ......................................................................................................................... 6
- Emissions Units and Control Equipment ............................................................................................. 6
- Emissions Inventories .......................................................................................................................... 7
- Ambient Air Quality Impact Analyses .................................................................................................. 7

REGULATORY ANALYSIS ................................................................................................................... 7
- Permit Conditions Review ................................................................................................................... 7

PUBLIC REVIEW ................................................................................................................................. 7
- Public Comment Opportunity .............................................................................................................. 7

APPENDIX A – FACILITY DRAFT COMMENTS

APPENDIX B – PROCESSING FEE
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
BMP best management practices
Btu British thermal units
CAA Clean Air Act
CAM Compliance Assurance Monitoring
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
CO₂ carbon dioxide
CO₂e CO₂ 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
GHG greenhouse gases
gph gallons per hour
gpm gallons per minute
gr grains (1 lb = 7,000 grains)
HAP hazardous air pollutants
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
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
NO₂ nitrogen dioxide
NOₓ nitrogen oxides
NSPS New Source Performance Standards
O&M operation and maintenance
O₂ oxygen
PC permit condition
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
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>POM</td>
<td>polycyclic organic matter</td>
</tr>
<tr>
<td>ppm</td>
<td>parts per million</td>
</tr>
<tr>
<td>ppmw</td>
<td>parts per million by weight</td>
</tr>
<tr>
<td>PSD</td>
<td>Prevention of Significant Deterioration</td>
</tr>
<tr>
<td>PTC</td>
<td>permit to construct</td>
</tr>
<tr>
<td>PTE</td>
<td>potential to emit</td>
</tr>
<tr>
<td>RICE</td>
<td>reciprocating internal combustion engines</td>
</tr>
<tr>
<td><strong>Rules</strong></td>
<td><em>Rules for the Control of Air Pollution in Idaho</em></td>
</tr>
<tr>
<td>scf</td>
<td>standard cubic feet</td>
</tr>
<tr>
<td>SCL</td>
<td>significant contribution limits</td>
</tr>
<tr>
<td>SIP</td>
<td>State Implementation Plan</td>
</tr>
<tr>
<td>SO₂</td>
<td>sulfur dioxide</td>
</tr>
<tr>
<td>SOₓ</td>
<td>sulfur oxides</td>
</tr>
<tr>
<td>T/day</td>
<td>tons per calendar day</td>
</tr>
<tr>
<td>T/hr</td>
<td>tons per hour</td>
</tr>
<tr>
<td>T/yr</td>
<td>tons per consecutive 12 calendar month period</td>
</tr>
<tr>
<td>TAP</td>
<td>toxic air pollutants</td>
</tr>
<tr>
<td>ULSD</td>
<td>ultra-low sulfur diesel</td>
</tr>
<tr>
<td>VOC</td>
<td>volatile organic compounds</td>
</tr>
<tr>
<td>yd³</td>
<td>cubic yards</td>
</tr>
<tr>
<td>μg/m³</td>
<td>micrograms per cubic meter</td>
</tr>
</tbody>
</table>
FACILITY INFORMATION

Description

Americrete Ready-Mix Concrete dba G&B Redi Mix – 00384 is a portable truck mix concrete batch plant consisting of aggregate stockpiles, a cement storage silo, a cement supplement (fly ash) storage silo, a weigh batcher, and conveyors. The 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, water heater(s) are used to heat the water in cold weather prior to use for the mixing of concrete.

The concrete batch plant is fed a mixture of aggregates from imported aggregate.

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 material passes over a scalping screen before being conveyed into the truck mixer.

Particulate emissions are controlled by maintaining the moisture content at 1.5% by weight for all ¼ in and smaller aggregate feed materials via water sprays.

The Applicant has concrete production rate throughput limits of 120 cubic yards per hour, 1,440 cubic yards per day, and 500,000 cubic yards per year.

Line power is used exclusively at the facility. Therefore, no IC engines powering electrical generators were included in the analysis.

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).

August 7, 2006 P-060019, Initial Concrete Batch Plant Permit, Permit status (A, but will become S upon issuance of this permit)

Application Scope

This PTC is for a revision of an existing PTC.

The applicant has proposed to revise existing permit P-060019 by changing out the dust collection system. This permit will be issued as P-2020.0032 in alignment with the current PTC naming convention.

Application Chronology

August 24, 2020 DEQ received an application and an application and processing fee.

September 23, 2020 DEQ determined that the application was complete.

October 28, 2020 DEQ made available the draft permit and statement of basis for peer and regional office review.

November 2, 2020 DEQ made available the draft permit and statement of basis for applicant review.

November 12, 2020 DEQ received the permit processing fee.

November 18, 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

<table>
<thead>
<tr>
<th>Source ID No.</th>
<th>Sources</th>
<th>Control Equipment</th>
<th>Emission Point ID No.</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>Maintaining the moisture content in ¼” or smaller aggregate material at 1.5% by weight, using water sprays, using shrouds, or other emissions controls</td>
<td>N/A</td>
</tr>
<tr>
<td>Boiler</td>
<td>Boiler: Manufacturer: Pearson Heating Systems Inc. Model: P-10-20W Manufacture Date: 2006 Heat input rating: 2.8 MMBtu/hr Fuel: LPG/Propane</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Boiler Exhaust: Exit height: 9 ft Exit diameter: 10 in</td>
</tr>
</tbody>
</table>

---

(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 PM₁₀ emission factors were used when determining PTE and for modeling purposes.
**Emissions Inventories**

This permitting action did not result in a change in emissions. For the technical analysis and emissions inventory please see the statement of basis for PTC No. P-060019 issued August 7, 2006 (2011AAG3229).

**Ambient Air Quality Impact Analyses**

An ambient air quality impact analysis is not required because this permitting action does not result in an emissions increase.

**REGULATORY ANALYSIS**

This permitting action did not result in a change in regulatory analysis. For the current regulatory analysis please see the statement of basis for PTC No. P-060019 issued August 7, 2006 (2011AAG3229).

**Permit Conditions Review**

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

Permit Conditions 1.1 – 1.3, Permit Scope

These permit conditions were revised to reflect purpose of changing the dust collection system.

Table 1.1, Regulated Sources

This table was revised to reflect the equipment used at the facility with the change out of the dust collection system.

**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 or IDAPA 58.01.01.404.04.
APPENDIX A – FACILITY DRAFT COMMENTS

On November 12, 2020, the facility stated they had no comments on the draft permit.
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: Americrete Ready-Mix Concrete dba
Address: 6701 East Flamingo Ave
City: Nampa
State: ID
Zip Code: 83687
Facility Contact: Mike O'Leary
Title: Production Manager
AIRS No.: 777-00384

Y Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

N Did this permit require engineering analysis? Y/N

N Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Annual Emissions Increase (T/yr)</th>
<th>Annual Emissions Reduction (T/yr)</th>
<th>Annual Emissions Change (T/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td>SO2</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td>CO</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td>PM10</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td>VOC</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td>Total:</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
</tbody>
</table>

Fee Due: $500.00

Comments: