Statement of Basis
Concrete Batch Plant General Permit

Permit to Construct No. P-2021.0054
Project ID 62753

P.W. Feenstra Construction, Inc. - 00643
Jerome, Idaho

Facility ID 777-00643

Final

March 2, 2022
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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
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
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
GHG	greenhouse gases
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
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_2	oxygen
PAH	polycyclic aromatic hydrocarbons
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
PTE	potential to emit
PW	process weight rate
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/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TEQ	toxicity equivalent
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

P.W. Feenstra Construction, Inc. - 00643 - 00643 has proposed a new 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, a water heater is used to heat the water in cold weather prior to use for the mixing of concrete.

The concrete batch plant will be 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 will pass over a scalping screen before being conveyed into the truck mixer.

The applicant has proposed concrete production rate throughput limits of 150 cubic yards per hour, 2,000 cubic yards per day, and 35,000 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

This is the initial PTC for a new facility thus there is no permitting history.

Application Scope

This is the initial PTC for a new facility.

Application Chronology

November 18, 2021	DEQ received an application and an application and processing fee.
November 26 – December 13, 2021	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
December 3, 2021	DEQ received supplemental information from the applicant.
December 17, 2021	DEQ determined that the application was complete.
December 28, 2021	DEQ received supplemental information from the applicant.
February 8, 2022	DEQ made available the draft permit and statement of basis for peer and regional office review.
February 14, 2022	DEQ made available the draft permit and statement of basis for applicant review.
March 2, 2	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	Reasonable controls: $PM_{10}/PM_{2.5}$ control efficiency: 75%	N/A
Concrete Mixer	Concrete Batch Plant – Truck Mix: Manufacturer: Con-E-Co Model: 327D Manufacture Date: 5/2017 Max. production: 150 yd^3/hr, 2,000 yd^3/day, and 35,000 yd^3/yr Cement Storage Silo: Storage capacity: 55 cubic yards (yd^3) Bin Vent Filter/Baghouse Manufacturer[a]: Con-E-Co Model: PJC-300 Second (Fly Ash) Storage Silo: Storage capacity: 49 cubic yards (yd^3) Bin Vent Filter/Baghouse Manufacturer[a]: Con-E-Co Model: PJC-300	Weigh Batcher Baghouse: Manufacturer: Con-E-Co Model: BV-14 $PM_{10}/PM_{2.5}$ control efficiency: 99.9% Cement Storage Silo Bin Vent Filter/Baghouse: Manufacturer: Con-E-Co Model: PJC-300 $PM_{10}/PM_{2.5}$ control efficiency: 99.9% Second Cement Storage Silo Bin Vent Filter/Baghouse: Manufacturer: Con-E-Co Model: PJC-300 $PM_{10}/PM_{2.5}$ control efficiency: 99.9% Truck Load-out: Shroud $PM_{10}/PM_{2.5}$ control efficiency: 75%	Weigh Batcher Baghouse Exhaust: Exit height: 17 ft (5.19 m) Exit diameter: 2x 0.17 ft (0.05 m) Exit flow rate: 180 acfm Cement Storage Silo Bin Vent Filter/Baghouse Exhaust: Exit height: 45 ft (13.72 m) Exit diameter: 0.75x1.32 ft (0.23x0.40 m) Exit flow rate: 1,500 acfm Second Storage Silo Bin Vent Filter/Baghouse Exhaust: Exit height: 15 ft (4.57 m) Exit diameter: 0.75x1.32 ft (0.23x0.40 m) Exit flow rate: 1,000 acfm
Boiler	Boiler: Manufacturer: Pearson Model: P10-20W Manufacture Date: 2014 Heat input rating: 2.8 MMBtu/hr Fuel: ULSD (0.0015% S by weight)	N/A	Boiler Exhaust: Exit height: 13 ft (3.97 m) Exit diameter: 0.83 ft (0.26 m) Exit flow rate: 1,000 acfm Exit temperature: 750°F (399 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 150 yd^3/hour, 2,000 yd^3/day, and 35,000 yd^3/year (per the Applicant).
- Baghouse/cartridge filter control efficiencies were assumed to be 99.0%.
- 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 are controlled by a baghouse/cartridge filter, and truck mix load-out emissions are controlled by a shroud. Capture efficiency of the truck mix load-out shroud was estimated at 75%.
- 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 75% control for 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 truck-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 11.12-1 (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.

[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.

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

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 123 yd^3/hr (0.82 x 150 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 2 transfer points.
- 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.

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)]	5.53	0.00	0.00	0.00	0.00
Boiler	0.29	0.019	1.75	0.44	0.05
Total, Point Sources	**5.82**	**0.019**	**1.75**	**0.44**	**0.05**

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.

[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 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	Chromium metal (II and III)	2.65E-04
	Ethyl benzene	5.57E-06
	Hexane	1.58E-01
	Manganese as Mn (fume)	1.28E-03
	Mercury (alkyl compounds as Hg)	3.68E-05
	Naphthalene	2.26E-05
	Phosphorous	7.67E-04
	Selenium	2.36E-04
	Toluene	5.43E-04
586	Arsenic	2.55E-04
	Benzene	4.28E-06
	Beryllium and compounds	1.35E-05
	Cadmium and compounds	1.31E-05
	Chromium (VI)	4.90E-05
	Formaldehyde	6.60E-04
	Nickel	2.50E-04
Not listed	Acenaphthene	4.22E-07
	Acenaphthylene	5.14E-09
	Anthracene	2.44E-08
	Benzo(b)fluoranthene	2.96E-08
	Benzo(g,h,i)perylene	4.52E-08
	Chrysene	4.76E-08
	Dibenzo(a,h)anthracene	3.34E-08
	Total	**0.1624**

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.

This is a new facility. Therefore, pre-project emissions are set to zero for all criteria pollutants.

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 4 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	1.67	0.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Boiler	0.07	0.04	0.005	0.003	0.40	0.20	0.10	0.05	0.02	0.01
Post Project Totals	**1.74**	**0.39**	**0.01**	**0.003**	**0.40**	**0.20**	**0.10**	**0.05**	**0.02**	**0.01**

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.

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 5 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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Post-Project Potential to Emit	1.74	0.39	0.01	0.003	0.40	0.20	0.10	0.05	0.02	0.01
Changes in Potential to Emit	**1.74**	**0.39**	**0.01**	**0.00**	**0.40**	**0.20**	**0.10**	**0.05**	**0.02**	**0.01**

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 6 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)
Chromium metal (II and III)	0.0	9.74E-05	0.00010	**0.033**	No
Copper (fume)	0.0	9.80E-06	0.00000980	**0.013**	No
Ethyl benzene	0.0	7.42E-07	0.0000	**29**	No
Hexane	0.0	2.10E-02	0.0210	**12**	No
Manganese as Mn (fume)	0.0	3.77E-04	0.0004	**0.067**	No
Mercury (alkyl compounds as Hg)	0.0	4.90E-06	0.0000049	**0.001**	No
Naphthalene (24-hour)	0.0	9.42E-04	0.0009	**3.33**	No
Phosphorous	0.0	2.98E-04	0.0003	**0.007**	No
Selenium	0.0	4.01E-05	0.0000401	**0.013**	No
Toluene	0.0	7.23E-05	0.000072	**25**	No
Zinc metal	0.0	6.53E-06	0.000007	**0.667**	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 7 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	0.0	**4.87E-06**	**4.87E-06**	**1.5E-06**	**Yes**
Benzene	0.0	4.89E-07	4.89E-07	8.0E-04	No
Beryllium and compounds	0.0	1.04E-06	1.04E-06	2.8E-05	No
Cadmium and compounds	0.0	1.20E-06	1.20E-06	3.7E-06	No
Chromium (VI)	0.0	**7.43E-07**	**7.43E-07**	**5.6E-07**	**Yes**
Formaldehyde	0.0	7.53E-05	7.53E-05	5.1E-04	No
Nickel	0.0	4.68E-06	4.68E-06	2.7E-05	No
PAHs Total	0.0	2.67E-08	2.67E-08	2.0E-06	No
POM Total	0.0	2.67E-08	2.67E-08	2.0E-06	No
Non-Listed (in 586) PAHs*					
Acenaphthene	0.0	4.82E-08	4.82E-08	9.10E-05	No
Acenaphthylene	0.0	5.87E-10	5.87E-10	9.10E-05	No
Anthracene	0.0	2.79E-09	2.79E-09	9.10E-05	No
Benzo(g,h,i)perylene	0.0	5.16E-09	5.16E-09	9.10E-05	No
Fluoranthene	0.0	1.11E-08	1.11E-08	9.10E-05	No
Fluorene	0.0	1.02E-08	1.02E-08	9.10E-05	No
Naphthalene (Annual)	0.0	2.58E-06	2.58E-06	9.10E-05	No
Phenanathrene	0.0	2.40E-08	2.40E-08	9.10E-05	No
Pyrene	0.0	9.70E-09	9.70E-09	9.10E-05	No

c) 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 and chromium (VI) 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 8 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

IDAPA Listing	Hazardous Air Pollutants	PTE (T/yr)
585	Chromium metal (II and III)	1.74E-05
	Ethyl benzene	3.71E-07
	Hexane	1.05E-02
	Manganese as Mn (fume)	8.11E-05
	Mercury (alkyl compounds as Hg)	2.45E-06
	Naphthalene	4.71E-04
	Phosphorous	4.96E-05
	Selenium	1.55E-05
	Toluene	3.62E-05
586	Arsenic	1.59E-05
	Benzene	5.58E-08
	Benzo(a)pyrene	1.05E-09
	Beryllium and compounds	4.70E-07
	Cadmium and compounds	1.16E-06
	Chromium (VI)	3.25E-06
	Formaldehyde	8.60E-06
	Nickel	1.64E-05
Not listed	Acenaphthene	5.50E-09
	Acenaphthylene	6.70E-11
	Anthracene	3.18E-10
	Benzo(b)fluoranthene	3.86E-10
	Benzo(g,h,l)perylene	5.89E-10
	Chrysene	6.20E-10
	Dibenzo(a,h)anthracene	4.35E-10
	Total	**0.0112**

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, Pb, 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.
- The Relocation Requirement permit condition

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

This modeling analysis for this facility demonstrates compliance with applicable standards in attainment areas. However, because a separate modeling analysis was not provided to demonstrate compliance with applicable standards in non-attainment areas, this portable facility is not permitted for operation in non-attainment areas. This requirement is assured by Permit Condition 2.6.

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.

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

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 9 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM_{10}	5.82	0.38	**100**	B
$PM_{2.5}$	3.47	0.23	**100**	B
SO_2	0.019	0.0022	**100**	B
NO_X	1.75	0.20	**100**	B
CO	0.44	0.05	**100**	B
VOC	0.05	0.01	**100**	B
HAP (single)	0.16	0.011	**10**	B
Total HAPs	0.20	0.011	**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 proposed new 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.

Registration Procedures and Requirements for Portable Equipment (IDAPA 58.01.01.500)

IDAPA 58.01.01.500……... Registration Procedures and Requirements for Portable Equipment

Section 01 requires that all existing portable equipment shall be registered within ninety (90) days after the original effective date of this Section 500 and at least ten (10) days prior to relocating, using forms provided by the Department, except that no registration is required for mobile internal combustion engines, marine installations and locomotives. This requirement is assured by Permit Condition 2.4.

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.

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 2.8.

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 ≥ 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 ≥ 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 150 yd^3/hr, E is calculated as follows:

Proposed throughput = 4,024 lb per cubic yard x 150 yd^3/hr = 603,600 lb/hr

Therefore, E is calculated as:

$E = 1.10 \times PW^{0.25} = 1.10 \times (603{,}600)^{0.25} = 30.66$ lb-PM/hr

As presented previously in the Emissions Inventories Section of this evaluation the post project PTE for this emissions unit is 1.67 lb-PM_{10}/hr. Assuming PM is 50% PM_{10} means that PM emissions will be 3.34 lb-PM/hr (1.67 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 2.7 and 2.10.

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 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.

MACT Applicability (40 CFR 63)

The facility is not subject to any MACT requirements 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.

Permit Condition 1.1 establishes the permit to construct scope.

Permit Condition, Table 1.1, provides a description of the purpose of the permit and the regulated sources, the process, and the control devices used at the facility.

FACILITY-WIDE CONDITIONS

As discussed previously, Permit Condition 2.1 establishes that the permittee shall take all reasonable precautions to prevent fugitive particulate matter (PM) from becoming airborne and provides examples of the controls in accordance with IDAPA 58.01.01.650-651.

As discussed previously, Permit Condition 2.2 establishes that the concrete batch plant shall employ efficient fugitive dust controls and provides examples of the controls in accordance with IDAPA 58.01.01.808.01 and 808.02.

Permit Condition 2.3 establishes that the concrete batch plant shall not collocate with a rock crushing plant, any other concrete batch plant, or a concrete batch plant as requested by the Applicant.

As discussed previously, Permit Condition 2.4 establishes that the permittee notify DEQ when the permitted portable equipment is relocated. This requirement is based upon imposing reasonable permit conditions for portable concrete batch plants.

Permit Condition 2.5 establishes that the permittee shall relocate the concrete batch plant equipment to a new pit or storage area once every 12 months. This requirement was requested by the Applicant because this is how the plant will normally be operated and because it allowed the set-back distances, required through the Ambient Air Quality Analysis, to be less than what would be required if more than one year of operation at a site was requested.

Permit Condition 2.6 establishes a restriction on locating the portable concrete batch plant to non-attainment areas. The location restrictions are based upon parameters used during the ambient air quality modeling analysis performed for this project.

As discussed previously, Permit Condition 2.7 establishes that there are to be no emissions of odorous gases, liquids, or solids from the permit equipment into the atmosphere in such quantities that cause air pollution.

As discussed previously, Permit Condition 2.8 establishes that the permittee shall monitor fugitive dust emissions on a daily basis to demonstrate compliance with the facility-wide permit requirements.

Permit Condition 2.9 establishes that the permittee record the date and location of the concrete batch plant each time it is relocated to demonstrate compliance with the Relocation Restriction permit condition.

As discussed previously, Permit Condition 2.10 establishes that the permittee monitor and record odor complaints to demonstrate compliance with the facility-wide permit requirements.

Permit Condition 2.11 establishes that the permittee shall maintain records as required by the Recordkeeping General Provision.

CONCRETE BATCH PLANT EQUIPMENT

Permit Condition 3.1 provides a process description of the concrete production process at this facility.

Permit Condition 3.2 provides a description of the control devices used on the concrete production equipment at this facility.

Permit Condition 3.3 establishes hourly and annual emissions limits for $PM_{2.5}$, SO_2, NO_X, CO, and VOC emissions from the concrete production operation at this facility.

As discussed previously, Permit Condition 3.4 establishes a 20% opacity limit for the concrete batch plant baghouse and the boiler stacks or functionally equivalent openings associated with the concrete production operation.

Permit Condition 3.5 establishes a daily and an annual concrete production limit for the concrete production operation as proposed by the applicant.

Permit Condition 3.6 requires that the applicant employ a baghouse filter to control emissions from the weigh batcher loadout operation as proposed by the applicant.

Permit Condition 3.7 requires that the applicant employ a boot or shroud to control emissions from the truck loadout operation as proposed by the applicant.

Permit Condition 3.8 requires that the applicant employ a baghouse to control emissions from the cement storage silo operation as proposed by the applicant.

Permit Condition 3.9 requires that the applicant employ a baghouse to control emissions from the fly ash silo operation as proposed by the applicant.

Permit Condition 3.10 requires that the applicant employ industry specific water sprays on material transfer points to control fugitive emissions as proposed by the applicant.

Permit Condition 3.11 establishes that the boiler will only operate a limited number of hours per day and hours per year. This operational limit was included because it limited emissions from the boiler.

Permit Condition 3.12 establishes the specifications of the fuel combusted in the boiler. This operational limit was included because it limited emissions from the boiler.

Permit Condition 3.13 establishes that the permittee monitor and record hourly and daily concrete production to demonstrate compliance with the Concrete Production Limits permit condition.

Permit Condition 3.14 establishes that the permittee shall establish procedures for operating the weigh batcher, cement storage silo, and cement supplement storage silo baghouses. This is a DEQ imposed standard requirement for operations using baghouses to control particulate emissions.

Permit Condition 3.15 establishes that the permittee shall record daily operation of the boiler to demonstrate compliance with the Boiler Operation Limits permit requirement.

Permit Condition 3.16 establishes that the permittee shall record the fuel specifications of the fuel delivered for the boiler to demonstrate compliance with the Boiler Fuel Specification permit requirement.

Permit Condition 3.17 establishes that the permittee shall maintain records as required by the Recordkeeping General Provision.

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

CRITERIA POLLUTANT EMISSION INVENTORY for Portable Concrete Batch Plant

Facility Information 2/25/22 9:07

Company:	**P.W. Feenstra Construction, Inc.**
Facility ID:	**777-00643**
Permit and Project No.:	**P-2021.0054 Project 62753**
Source Type:	**Portable Concrete Batch Plant**
Manufacturer/Model:	**CON-E-CO/327D**

Assumptions Implied or Stated in Application:

See control assumptions

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

Production Rates[1]

Maximum Hourly Production Rate:	**150**	cy/hr	Per manufacturer
Proposed Daily Production Rate:	**2,000**	cy/day	**13.33** Hours of operation per day at max capacity
Proposed Maximum Annual Production Rate:	**35,000**	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		Control Assumptions:	
	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]		
Aggregate delivery to ground storage		0.00096		0.0031	0.04	0.12	0.02	0.48	0.065	1.55	9.59E-04	4.20E-03	0.003	0.014	**75%**	Water Sprays at Operator's Discretion
Sand delivery to ground storage		0.000225		0.0007	0.01	0.03	4.69E-03	0.11	0.015	0.35	2.25E-04	9.84E-04	0.001	0.003	**75%**	Water Sprays at Operator's Discretion
Aggregate transfer to conveyor		0.00096		0.0031	0.04	0.12	0.02	0.48	0.065	1.55	9.59E-04	4.20E-03	0.003	0.014	**75%**	Water Sprays at Operator's Discretion
Sand transfer to conveyor		0.000225		0.0007	0.01	0.03	4.69E-03	0.11	0.015	0.35	2.25E-04	9.84E-04	0.001	0.003	**75%**	Water Sprays at Operator's Discretion
Aggregate transfer to elevated storage		0.00096		0.0031	0.04	0.12	0.02	0.48	0.065	1.55	9.59E-04	4.20E-03	0.003	0.014	**75%**	Water Sprays at Operator's Discretion
Sand transfer to elevated storage		0.000225		0.0007	0.01	0.03	4.69E-03	0.11	0.015	0.35	2.25E-04	9.84E-04	0.001	0.003	**75%**	Water Sprays at Operator's Discretion
Cement delivery to Silo (controlled EF)	**0.00003**		**0.0001**		4.50E-03	1.25E-02	**2.50E-03**	6.00E-02	**6.96E-03**	1.67E-01	1.20E-04	5.25E-04	3.33E-04	**1.46E-03**	**0.00%**	Baghouse is process equipment, use controlled EF
Cement supplement delivery to Silo (controlled EF)	**0.000045**		**0.0002**		6.75E-03	2.68E-02	**3.75E-03**	9.00E-02	**1.49E-02**	3.58E-01	1.80E-04	7.88E-04	7.14E-04	**3.13E-03**	**0.00%**	Baghouse is process equipment, use controlled EF
Weigh hopper loading (sand & aggregate batcher loading)		**0.001185**		**0.00395**	1.78E-03	5.93E-03	**9.88E-04**	2.37E-02	**3.29E-03**	7.90E-02	4.73E-05	2.07E-04	1.58E-04	**6.92E-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		**0.0473**		**0.07874**	1.77E+00	2.95	**0.99**	23.65	**1.64**	39.37	4.72E-02	2.07E-01	0.08	**0.34**	**75.0%**	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		**0.0000**		**0.0000**	0.00E+00	0.00	**0.00**	0.00	**0.00**	0.00	0.00E+00	0.00E+00	0.00	**0.00**	**75.0%**	Baghouse control
Point Sources Total Emissions		**4.86E-02**		**8.30E-02**	**1.79E+00**	**3.00E+00**	**9.93E-01**	**2.38E+01**	**1.67E+00**	**4.00E+01**	**4.76E-02**	**2.08E-01**	**7.99E-02**	**3.50E-01**		
Process Fugitive Emissions		0.003555		0.0114	0.13	0.43	0.07	1.78	0.24	5.71	0.00	0.02	0.01	0.05		
Facility Wide Total: Point Sources + Process Fugitives (Except for Road Dust and Windblown Dust)				0.0944		3.43	1.07	25.60	1.90	45.68			0.09	0.40		

POINT SOURCE EMISSIONS for FACILITY CLASSIFICATION[5] **Controlled EF** **at** **1,314,000 cy/yr** **T/yr** (controlled PTE @ 8,760)

Facility Classification Total PM[6]		**2.81E-02**		**1.85E+01**
Facility Classification Total PM10[6,8]		**2.00E-02**		**1.31E+01**

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 = 3,600 cy/day, and 1,314,000 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	4.01E-07	1.63E-04	9.37E-05	2.23E-07	Point Source	1.76E-06
Cement supplement delivery to Silo [3]	**5.20E-07**	ND	2.85E-06	1.15E-03	6.64E-04	1.58E-06	Point Source	1.25E-05
Truck Loadout (with 99.9% control) [8]		**3.62E-06**	3.83E-05	1.55E-02	8.93E-03	2.13E-05	Fugitive	1.68E-04
Central Mix (with l30% control)		**0.00E+00**	0.00E+00	0.00E+00	0.00E+00	0.00E+00	Fugitive	0.00E+00
Total			**4.15E-05**	**1.68E-02**	**0.010**		**Point Sources**	**1.42E-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. hourlv rate = EF x pound of cement/yd^3 of concrete x max. hourlv 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

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/h
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" should
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:	P.W. Feenstra Construction, Inc.
Facility ID:	777-00643
Permit and Project No.:	P-2021.0054 Project 62753
Source Type:	Portable Concrete Batch Plant
Manufacturer/Model:	CON-E-CO/327D

2. Concrete Production Rates

Maximum Hourly Concrete Production Rate:	150		
Proposed Daily Concrete Production Rate:	2,000	cy/day	13.33
Proposed Maximum Annual Concrete Production Rate:	35,000	cy/year	hr/day

3. Daily Operating Hours

Maximum daily hours of operation for facility?	14

4. Concrete Batch Plant Specifications

Is the facility type a truck mix (T) or central mix (C)?	T
What level of PM control is used for loadout, either Truck or Central?	75%
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?		1	Heat Input Rating	
Water Heater #1				
If using a water heater, select the proposed fuel types and enter the heat input rating of water heater #1.	Natural Gas	0	2.8	MMBtu/hr
	Diesel	1		
	Propane	0		
Water Heater #2				
If multiple units, select the proposed fuel types and enter the heat input rating of water heater #2.	Natural Gas	0	0	MMBtu/hr
	Diesel	0		
	Propane	0		
Are you assuming continual operations throughout the year?		No		
Maximum annual hours of water heater operation? (If assuming continual operation, enter 8,760)		1,000		

6. Internal Combustion Engine(s)

Are internal combustion engines used to provide electrical power at the facility?	No
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

Please enter 0 for all units.

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)	2

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

2/25/2022 9:07

Facility Information

Company:	P.W. Feenstra Construction, Inc.
Facility ID:	777-00643
Permit No.:	P-2021.0054 Project 62753
Source Type:	Portable Concrete Batch Plant
Manufacturer:	CON-E-CO/327D

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: 1

Central Mix Batching Factor: 0

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:	150	cy/hr	
Proposed Daily Production Rate:	2,000	cy/day	
Proposed Maximum Annual Production Rate:	35,000	cy/year	

Uncontrolled (Unlimited Production Rate)

	24 hrs/day,
3,600 cy/day	7 day/wk,
1,314,000 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)	6.02E-07	**1.22E-05**	1.04E-07	**2.44E-07**	9.06E-09	**3.42E-08**	4.10E-06	**1.14E-05**	2.08E-05	**6.12E-05**	4.78E-06	**1.19E-05**	1.23E-05	**3.84E-05**	1.13E-07	**2.62E-06**	**21.29%**
Central Mix Batching (NO boot or shroud)	0.00E+00	**0.00E+00**	ND	ND	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**	ND	ND	**21.29%**

UNCONTROLLED TAP EMISSIONS **Note: Includes baghouses as process equipment.** **3,600 cy/day, and 1,314,000 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)	1.56E-07	6.84E-07	1.79E-08	7.84E-08	8.62E-06	3.77E-05	1.07E-06	4.06E-05	4.31E-06	1.89E-05	1.54E-06	6.74E-06	4.35E-04	1.90E-03	ND	ND	2.14E-07	
Cement supplement silo filling (with baghouse)	5.48E-06	2.40E-05	4.95E-07	2.17E-06	1.08E-09	4.75E-09	6.68E-06	2.93E-05	1.40E-06	6.14E-06	1.25E-05	5.47E-05	1.94E-05	8.49E-05	3.96E-07	1.74E-06	2.00E-06	
Truck loading (no boot or shroud)	5.16E-04	2.26E-03	1.03E-05	4.52E-05	1.45E-06	6.34E-06	4.82E-04	2.11E-03	2.59E-03	1.13E-02	5.03E-04	2.20E-03	1.62E-03	7.11E-03	1.11E-04	4.85E-04	1.03E-04	
Central Mix Batching (NO boot or shroud)	0.00E+00	0.00E+00	ND	ND	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	ND	ND	0.00E+00	Facility Classification: Total Annual HAPs Emissions
Sources Total	**5.22E-04**	2.29E-03	**1.08E-05**	4.75E-05	**1.01E-05**	4.41E-05	**4.90E-04**	2.18E-03	**2.59E-03**	1.14E-02	**5.17E-04**	2.27E-03	**2.08E-03**	9.10E-03	**1.11E-04**	4.87E-04	**1.05E-04**	**2.78E-02** **Tons per year**
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**	

CONTROLLED TAP EMISSIONS **Note: Includes baghouses as process equipment.** **2,000 cy/day, and 35,000 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]	4.16E-09	1.82E-08	4.77E-10	2.09E-09	2.30E-07	1.01E-06	5.93E-07	1.25E-07	2.39E-06	5.03E-07	4.10E-08	1.80E-07	ND	ND	ND	ND	5.69E-09	
Cement supplement silo filling (with baghouse)[2]	1.46E-07	6.39E-07	1.32E-08	5.77E-08	2.89E-11	1.26E-10	2.50E-05	7.79E-07	5.24E-06	1.64E-07	3.33E-07	1.46E-06	7.24E-05	2.26E-06	2.20E-07	4.62E-08	5.34E-08	
Truck loading (with baghouse)	3.44E-06	1.51E-05	6.87E-08	3.01E-07	9.63E-09	4.22E-08	6.70E-05	1.41E-05	3.60E-04	7.55E-05	3.35E-06	1.47E-05	2.26E-04	4.74E-05	1.54E-05	3.23E-06	6.84E-07	**75.00%** Boot, enclosure, or equivalent or baghouse or boot w/water ring
Central Mix Batching (WITH boot or shroud)	0.00E+00	0.00E+00	ND	ND	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	ND	ND	0.00E+00	**75.00%** Baghouse control
Sources Total	**3.59E-06**	1.57E-05	**8.24E-08**	3.61E-07	**2.39E-07**	1.05E-06	**9.25E-05**	1.50E-05	**3.67E-04**	7.62E-05	**3.73E-06**	1.63E-05	**2.98E-04**	4.96E-05	**1.56E-05**	3.28E-06	**7.43E-07**	**1.77E-04** **Tons per year**
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	239.10%		0.29%		6.46%		0.28%		0.1103%		13.80%		4.26%		0.1201%		132.65%	
EXCEEDS EL?	**Yes**		No		No		No		No		No		No		No		**Yes**	

[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

NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)

Operating Assumptions:

0 MMBtu/hr 1,020 MMBtu/MMscf = 0.00E+00 MMscf/hr **Fuel Use:**

0% used by heater 1 **0** hr/day **0.000 MMscf/day**

0% used by heater 2 **0** hr/yr **0.000 MMscf/year**

Criteria Air Pollutants	Emission Factor	Emissions		CBP + Boiler Emissions	Modeling Threshold		Modeling Required?	Modeling Threshold		Modeling Required?
	lb/MMscf	lb/hr	T/yr	T/yr	2002 Guidance			Case-by-Case		
NO2	100	0.00E+00	0.00E+00	0.00E+00	1	T/yr	No	7	T/yr	No
CO	84	0.00E+00	0.00E+00	0.00E+00	14	lb/hr	No	70	lb/hr	No
PM10	7.6	0.00E+00	0.00E+00	3.50E-01	0.2	lb/hr	No	0.9	lb/hr	No
		0.00E+00	0.00E+00		1	T/yr	No	7	T/yr	No
PM2.5	7.6	0.00E+00	0.00E+00	2.08E-01						
		0.00E+00	0.00E+00							
SOx	0.6	0.00E+00	0.00E+00	0.00E+00	0.2	lb/hr	No	0.9	lb/hr	No
		0.00E+00	0.00E+00		1	T/yr	No	7	T/yr	No
VOC	5.5	0.00E+00	0.00E+00	0.00E+00	40	T/yr	No			
Lead	0.0005	0.00E+00	0.00E+00	9.69E-03	0.6	T/yr	No			
Lead, continued			5.37E-03	lb/quarter	**10**	lb/mo	No			
		TOTAL	**0.00E+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/MMscf	lb/hr	T/yr	EL (lb/hr)	
PAH HAPs					
2-Methylnaphthalene	2.40E-05	**0.00E+00**	**0.00E+00**	9.10E-05	No
3-Methylchloranthrene	1.80E-06	**0.00E+00**	**0.00E+00**	2.50E-06	No
7,12-Dimethylbenz(a)anthrace	1.60E-05	0.00E+00	0.00E+00		
Acenaphthene	1.80E-06	**0.00E+00**	**0.00E+00**	9.10E-05	No
Acenaphthylene	1.80E-06	**0.00E+00**	**0.00E+00**	9.10E-05	No
Anthracene	2.40E-06	**0.00E+00**	**0.00E+00**	9.10E-05	No
Benzo(a)anthracene	1.80E-06	**0.00E+00**	**0.00E+00**	9.10E-05	See POM
Benzo(a)pyrene	1.20E-06	**0.00E+00**	**0.00E+00**	2.00E-06	See POM
Benzo(b)fluoranthene	1.80E-06	**0.00E+00**	**0.00E+00**		See POM
Benzo(g,h,i)perylene	1.20E-06	**0.00E+00**	**0.00E+00**	9.10E-05	No
Benzo(k)fluoranthene	1.80E-06	**0.00E+00**	**0.00E+00**		See POM
Chrysene	1.80E-06	**0.00E+00**	**0.00E+00**		See POM
Dibenzo(a,h)anthracene	1.20E-06	**0.00E+00**	**0.00E+00**		See POM
Dichlorobenzene	1.20E-03	**0.00E+00**	**0.00E+00**	9.10E-05	No
Fluoranthene	3.00E-06	**0.00E+00**	**0.00E+00**	9.10E-05	No
Fluorene	2.80E-06	**0.00E+00**	**0.00E+00**	9.10E-05	No
Indeno(1,2,3-cd)pyrene	1.80E-06	**0.00E+00**	**0.00E+00**		See POM
Naphthalene	6.10E-04	0.00E+00	0.00E+00	3.33	No
Naphthalene	6.10E-04	**0.00E+00**	**0.00E+00**	9.10E-05	No
Phenanathrene	1.70E-05	**0.00E+00**	**0.00E+00**	9.10E-05	No
Pyrene	5.00E-06	**0.00E+00**	**0.00E+00**	9.10E-05	No
Polycyclic Organic Matter (POM)	7-PAH Group	**0.00E+00**	**0.00E+00**	2.00E-06	No
Non-PAH HAPs					
Benzene	2.10E-03	**0.00E+00**	**0.00E+00**	8.00E-04	No
Formaldehyde	7.50E-02	**0.00E+00**	**0.00E+00**	5.10E-04	No
Hexane	1.80E+00	0.00E+00	0.00E+00	12	No
Toluene	3.40E-03	0.00E+00	0.00E+00	25	No
Non-HAP Organic Compounds					
Butane	2.10E+00	0.00E+00	0.00E+00		
Ethane	3.10E+00	0.00E+00	0.00E+00		
Pentane	2.60E+00	0.00E+00	0.00E+00	118	No
Propane	1.60E+00	0.00E+00	0.00E+00		
Metals (HAPs)					
Arsenic	2.00E-04	**0.00E+00**	**0.00E+00**	1.50E-06	No
Barium	4.40E-03	0.00E+00	0.00E+00	0.033	No
Beryllium	1.20E-05	**0.00E+00**	**0.00E+00**	2.80E-05	No
Cadmium	1.10E-03	**0.00E+00**	**0.00E+00**	3.70E-06	No
Chromium	1.40E-03	0.00E+00	0.00E+00	0.033	No
Cobalt	8.40E-05	0.00E+00	0.00E+00	0.0033	No
Copper	8.50E-04	0.00E+00	0.00E+00	0.013	No
Manganese	3.80E-04	0.00E+00	0.00E+00	0.067	No
Mercury	2.60E-04	0.00E+00	0.00E+00	0.003	No
Molybdenum	1.10E-03	0.00E+00	0.00E+00	0.333	No
Nickel	2.10E-03	**0.00E+00**	**0.00E+00**	2.70E-05	No
Selenium	2.40E-05	0.00E+00	0.00E+00	0.013	No
Vanadium	2.30E-03	0.00E+00	0.00E+00	0.003	No
Zinc	2.90E-02	0.00E+00	0.00E+00	0.667	No

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

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

TOTAL CBP + WATER HEATER EMISSIONS (POINT SOURCES, T/YR)	0.57

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

Operating Assumptions:

2.8 MMBtu/hr / 140 MMBtu/10^3 gal = 2.00E-02 10^3 gal/hr **Fuel Use:**
100% used by heater 1 **14** hr/day **280.00 gal/day**
0% used by heater 2 **1,000** hr/yr **20,000 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	4.00E-01	2.00E-01	2.00E-01	1	T/yr	No	7	T/yr	No
CO	5	1.00E-01	5.00E-02	5.00E-02	14	lb/hr	No	70	lb/hr	No
PM10 (filterable + condensable)	3.3	6.60E-02	3.30E-02	3.83E-01	0.2	lb/hr	No	0.9	lb/hr	No
		6.60E-02	3.30E-02		1	T/yr	No	7	T/yr	No
PM2.5 (filterable + condensable)	1.8	3.60E-02	1.80E-02	2.26E-01						
		3.60E-02	1.80E-02							
SOx (SO2 + SO3)	0.216	4.32E-03	2.16E-03	2.16E-03	0.2	lb/hr	No	0.9	lb/hr	No
		4.32E-03	2.16E-03		1	T/yr	No	7	T/yr	No
VOC (TOC)	0.556	1.11E-02	5.56E-03	5.56E-03	40	T/yr	No			
Lead EF = 9 lb/10^{12} Btu	9	2.52E-05	1.26E-05	9.70E-03	0.6	T/yr	No			
Lead, continued			6.30E-03	lb/quarter	**10**	lb/mo	No			
		TOTAL	**2.91E-01**	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	**4.82E-08**	**5.50E-09**	9.10E-05	No
Acenaphthylene	2.57E-07	**5.87E-10**	**6.70E-11**	9.10E-05	No
Anthracene	1.22E-06	**2.79E-09**	**3.18E-10**	9.10E-05	No
Benzo(a)anthracene	4.01E-06	**9.16E-09**	**1.05E-09**	9.10E-05	See POM
Benzo(a)pyrene				2.00E-06	See POM
Benzo(b,k)fluoranthene	1.48E-06	**3.38E-09**	**3.86E-10**		See POM
Benzo(g,h,i)perylene	2.26E-06	**5.16E-09**	**5.89E-10**	9.10E-05	No
Benzo(k)fluoranthene	0.00E+00	**0.00E+00**	**0.00E+00**		See POM
Chrysene	2.38E-06	**5.43E-09**	**6.20E-10**		See POM
Dibenzo(a,h)anthracene	1.67E-06	**3.81E-09**	**4.35E-10**		See POM
Dichlorobenzene				9.10E-05	No
Fluoranthene	4.84E-06	**1.11E-08**	**1.26E-09**	9.10E-05	No
Fluorene	4.47E-06	**1.02E-08**	**1.17E-09**	9.10E-05	No
Indeno(1,2,3-cd)pyrene	2.14E-06	**4.89E-09**	**5.58E-10**		See POM
Naphthalene	1.13E-03	9.42E-04	4.71E-04	3.33	No
Naphthalene	1.13E-03	**2.58E-06**	**2.95E-07**	9.10E-05	No
Phenanathrene	1.05E-05	**2.40E-08**	**2.74E-09**	9.10E-05	No
Pyrene	4.25E-06	**9.70E-09**	**1.11E-09**	9.10E-05	No
Polycyclic Organic Matter (POM)	7-PAH Group	**2.67E-08**	**3.04E-09**	2.00E-06	No
Non-PAH HAPs					
Benzene	2.14E-04	**4.89E-07**	**5.58E-08**	8.00E-04	No
Ethyl benzene	6.36E-05	7.42E-07	3.71E-07	2.90E+01	No
Formaldehyde	3.30E-02	**7.53E-05**	**8.60E-06**	5.10E-04	No
Hexane	1.80E+00	2.10E-02	1.05E-02	12	No
Toluene	6.20E-03	7.23E-05	3.62E-05	25	No
o-Xylene	1.09E-04			0.007	
Metals (HAPs)	lb/10^{12} Btu				
Arsenic	4.00E+00	**1.28E-06**	**1.46E-07**	1.50E-06	No
Barium				0.033	No
Beryllium	3.00E+00	**9.59E-07**	**1.09E-07**	2.80E-05	No
Cadmium	3.00E+00	**9.59E-07**	**1.09E-07**	3.70E-06	No
Chromium	3.00E+00	4.90E-06	2.45E-06	0.033	No
Cobalt				0.0033	No
Copper	6.00E+00	9.80E-06	4.90E-06	0.013	No
Manganese	6.00E+00	9.80E-06	4.90E-06	0.067	No
Mercury	3.00E+00	4.90E-06	2.45E-06	0.003	No
Molybdenum				0.333	No
Nickel	3.00E+00	**9.59E-07**	**1.09E-07**	2.70E-05	No
Selenium	1.50E+01	2.45E-05	1.23E-05	0.013	No
Vanadium				0.003	No
Zinc	4.00E+00	6.53E-06	3.27E-06	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)	0.88

PROPANE/BUTANE COMBUSTION, AP-42 SECTION 1.5 (9/98)

Operating Assumptions:

0 MMBtu/hr / 91.5 MMBtu/10^3 gal = 0.00E+00 10^3 gal/hr **Fuel Use:**

0% used by heater 1 **0** hr/day **0.00 gal/day**

0% used by heater 2 **0** hr/yr **0 gal/year**

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	15	0.00E+00	0.00E+00	0.00E+00	1	T/yr	No	7	T/yr	No
CO	8.4	0.00E+00	0.00E+00	0.00E+00	14	lb/hr	No	70	lb/hr	No
PM10 (filterable + condensable)	0.8	0.00E+00	0.00E+00	3.50E-01	0.2	lb/hr	No	0.9	lb/hr	No
		0.00E+00	0.00E+00		1	T/yr	No	7	T/yr	No
PM2.5 (filterable + condensable)	0.8	0.00E+00	0.00E+00	2.08E-01						
		0.00E+00	0.00E+00							
SOx (SO2 + SO3)	1.479	0.00E+00	0.00E+00	0.00E+00	0.2	lb/hr	No	0.9	lb/hr	No
		0.00E+00	0.00E+00		1	T/yr	No	7	T/yr	No
VOC (TOC)	1.1	0.00E+00	0.00E+00	0.00E+00	40	T/yr	No			
Lead EF = 9 lb/10^{12} Btu	0	0.00E+00	0.00E+00	9.69E-03	0.6	T/yr	No			
Lead, continued			0.00E+00	lb/quarter	**10**	lb/mo	No			
		TOTAL	**0.00E+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)					

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

TOTAL CBP + WATER HEATER EMISSIONS (POINT SOURCES, T/YR)	0.57

CURRENT PTC APPLICATION ESTIMATES

Do you have an internal combustion engine? **No**

Internal Combustion Engine(s) AP-42 Section 3.3 or 3.4 (diesel fueled)			
		Fuel Type(s)	**Generator Toggle**
Generator Make/Model	**Enter Info**	#2 Fuel Oil (Diesel)	**1**
Rating of Large Engine (hp)	**0.0**	Max Sulfur weight percent (w/o)	**0.0015%**
Rating of Small Engine #1 (hp)	**0.0**		
Rating of Small Engine #2 (hp)	**0.0**		
EF OPTIONS:		**Use EFs in lb/MMBtu fuel input**	
1 hp = 0.7456999 kW	0.7457	Calculated Max Fuel Use Rate, gal/hr (Large)	0.00
Avg brake-specific fuel consumption (BSFC) = 7000 Btu/hp-hr	7000	Calculated Max Fuel Use Rate, gal/hr (small #1)	0.00
Fuel Heating Value, Btu/gal	137,030	Calculated Max Fuel Use Rate, gal/hr (small #2)	0.00
		Calculated MMBtu/hr (Large)	0.00
		Calculated MMBtu/hr (Small #1)	0.00
		Calculated MMBtu/hr (Small #2)	0.00
Note: AP-42 Tables 3.3-x,3.4-x: avg diesel heating value is based on 19,300 Btu/lb with density equal 7.1 lb/gal=> Btu/gal =			137,030

EPA Certification for Large Engine:	**-1**
Not EPA-certified: Enter "0" (zero)	
Certified Tier I, Tier 2, Tier 3, or Tier 4: Enter 1, 2, 3, or 4	
Certified "BLUE SKY" engine: Enter 5	

EPA Certification for Small Engine #1:	**-1**
Not EPA-certified: Enter "0" (zero)	
Certified Tier I, Tier 2, Tier 3, or Tier 4: Enter 1, 2, 3, or 4	
Certified "BLUE SKY" engine: Enter 5	

EPA Certification for Small Engine #2:	**-1**
Not EPA-certified: Enter "0" (zero)	
Certified Tier I, Tier 2, Tier 3, or Tier 4: Enter 1, 2, 3, or 4	
Certified "BLUE SKY" engine: Enter 5	

Facility: **P.W. Feenstra Construction, Inc.**

2/25/2022 9:07 **Permit/Facility ID:** **Project 62753** **777-00643** User Input Weight % Sulfur = 0.0015% SO2 EF = 1.01 x S

Large Engine

Fuel Type Toggle = 0 0 hp Engine
Fuel Consumption Rate 0.00 gal/hr
Calculated MMBtu/hr 0.0000 MMBtu/hr
Max Daily Operation 14 hr/day
Max Annual Operation 0 hrs/yr

Pollutant	Emission Factor[a] (lb/MMBtu)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PM [b]	0.1	0.000	0.00	
PM-10 (total) [d]	0.000	0.000	0.000	
P.M.-2.5	0.000	0.000	0.000	
CO [b]	0.00	0.000	0.00	
NOx[b]	0.000	0.000	0.00	
SO_2 [b] (total SOx presume	0.001515	0.000	0.000	
VOC [b] (total TOC--> VOC	0.000	0.000	0.000	
Lead				
HCl [e]				
Dioxins[e]				
2,3,7,8-TCDD				
Total TCDD				
1,2,3,7,8-PeCDD				
Total PeCDD				
1,2,3,4,7,8-HxCDD[c]				
1,2,3,6,7,8-HxCDD				
1,2,3,7,8,9-HxCDD[c]				
Total HxCDD				
1,2,3,4,6,7,8-Hp-CDD[c]				
Total $HpCDD_c$				
Octa CDD[c]				
Total PCDD[c]				
Furans[e]				
2,3,7,8-TCDF				
Total TCDF[c]				
1,2,3,7,8-PeCDF				
2,3,4,7,8-PeCDF				
Total PeCDF[c]				
1,2,3,4,7,8-HxCDF				
1,2,3,6,7,8-HxCDF				
2,3,4,6,7,8-HxCDF				
1,2,3,7,8,9-HxCDF				
Total HxCDF[c]				
1,2,3,4,6,7,8-HpCDF				
1,2,3,4,7,8,9-HpCDF				
Total HpCDF[c]				
Octa CDF[c]				
Total PCDF[c]				
Total PCDD/PCDF[c]				
Non-PAH HAPs				
Acetaldehyde[c]	7.67E-04	0.00E+00	0.00E+00	**0.00E+00**
Acrolein[c]	9.25E-05	0.00E+00	0.00E+00	0.00E+00
Benzene[c,e]	9.33E-04	0.00E+00	0.00E+00	**0.00E+00**
1,3-Butadiene[c,e]	3.91E-05	0.00E+00	0.00E+00	**0.00E+00**
Ethylbenzene[e]				
Formaldehyde[c,e]	1.18E-03	0.00E+00	0.00E+00	**0.00E+00**
Hexane[e]				
Isooctane				
Methyl Ethyl Ketone[e]				
Pentane[e]				
Propionaldehyde[e]				
Quinone[e]				
Methyl chloroform[e]				
Toluene[c,e]	4.09E-04	0.00E+00	0.00E+00	0.00E+00
Xylene[c,e]	2.85E-04	0.00E+00	0.00E+00	0.00E+00
PAH, Total		0.00E+00		**0.00E+00**
POM (7-PAH Group)		0.00E+00	0.00E+00	**0.00E+00**

Pollutant	Emission Factor[a] (lb/MMBtu)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) **Annual** or 24-hr Average
PAH HAPs				
2-Methylnaphthalene				
3-Methylchloranthrene[e]				
Acenaphthene[c1]	1.42E-06	0.00E+00	0.00E+00	**0.00E+00**
Acenaphthylene[c1]	5.06E-06	0.00E+00	0.00E+00	**0.00E+00**
Anthracene[c1]	1.87E-06	0.00E+00	0.00E+00	**0.00E+00**
Benzo(a)anthracene[c1]	1.68E-06	0.00E+00	0.00E+00	**0.00E+00**
Benzo(a)pyrene[c1,e]	1.88E-07	0.00E+00	0.00E+00	**0.00E+00**
Benzo(b)fluoranthene[c1]	9.91E-08	0.00E+00	0.00E+00	**0.00E+00**
Benzo(e)pyrene				
Benzo(g,h,I)perylene[c1]	4.89E-07	0.00E+00	0.00E+00	**0.00E+00**
Benzo(k)fluoranthene[c1]	1.55E-07	0.00E+00	0.00E+00	**0.00E+00**
Chrysene[c1]	3.53E-07	0.00E+00	0.00E+00	**0.00E+00**
Dibenzo(a,h)anthracene[c1]	5.83E-07	0.00E+00	0.00E+00	**0.00E+00**
Dichlorobenzene				
Fluoranthene[c1]	7.61E-06	0.00E+00	0.00E+00	**0.00E+00**
Fluorene[c1]	2.92E-05	0.00E+00	0.00E+00	**0.00E+00**
Indeno(1,2,3-cd)pyrene[c1]	3.75E-07	0.00E+00	0.00E+00	**0.00E+00**
Naphthalene[c1,e]	8.48E-05	0.00E+00	0.00E+00	**0.00E+00**
Perylene				
Phenanthrene[c1]	2.94E-05	0.00E+00	0.00E+00	**0.00E+00**
Pyrene[c1]	4.78E-06	0.00E+00	0.00E+00	**0.00E+00**
Non-HAP Organic Compounds				
Acetone[e]				
Benzaldehyde				
Butane				
Butyraldehyde				
Crotonaldehyde[e]				
Ethylene				
Heptane				
Hexanal				
Isovaleraldehyde				
2-Methyl-1-pentene				
2-Methyl-2-butene				
3-Methylpentane				
1-Pentene				
n-Pentane				
Valeraldehyde				
Metals				
Antimony[e]				
Arsenic[e]				
Barium[e]				
Beryllium[e]				
Cadmium[e]				
Chromium[e]				
Cobalt[e]				
Copper[e]				
Hexavalent Chromium[e]				
Manganese[e]				
Mercury[e]				
Molybdenum[e]				
Nickel[e]				
Phosphorus[e]				
Silver[e]				
Selenium[e]				
Thallium[e]				
Vanadium[e]				
Zinc[e]				

a) Emission factors are from AP-42
b) AP-42, Table 3.4-1, Gaseous Emission Factors for Large Stationary Diesel and All Stationary Dual Fuel Engines, 10/96
c) AP-42, Table 3.4-3, Speciated Organic Compound Emission Factors for Large Uncontrolled Stationary Diesel Engines, **Emission Factor Rating E**, 10/96
c1) AP-42, Table 3.4-4, PAH Emission Factors for Large Uncontrolled Stationary Diesel Engines, **Emission Factor Rating E**, 10/96
d) AP-42, Table 3.4-2, Particulate and Particle-Sizing Emission Factors for Large Uncontrolled Stationary Diesel Engines, **Emission Factor Rating E**, 10/96
e) IDAPA Toxic Air Pollutant

TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Facility: P.W. Feenstra Construction, Inc.
P-2021.0054
Project

2/25/2022 9:07 **Permit/Facility ID:** 62753 777-00643 User Input Weight % Sulfur = 0.0015% SCG EF = 1.01 x S

Small Engine #1

Fuel Type Toggle = G 0 hp Engine
Fuel Consumption Rate 0.00 gal/hr
Calculated MMBtu/hr 0.0000 MMBtu/hr
Max Daily Operation hr/day
Max Annual Operation hr/yr

Pollutant	Emission Factor[a] (lb/MMBtu)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) Annual or 24-hr Average
SO_2	n.a.	n.data	n.data	
SO_2 (< lowest [b])	n.data	n.data	n.data	
PM 2.5	0.000	0.000	0.00	
CO [c]	0.00	0.000	0.00	
NO_x	0.000	0.000	0.00	
SO_x [d] (total SOx presumed SO2)	0.00151S	0.000	0.000	
VOC [e] (total TOC [f] - CH_4 - VOC [c])	0.000	0.000	0.000	
Lead	S	lb/yr		
HCl [g]				
Dioxins[a]				
2,3,7,8-TCDD				
Total TCDD				
1,2,3,7,8-PeCDD				
Total PeCDD				
1,2,3,4,7,8-HxCDD				
1,2,3,6,7,8-HxCDD				
1,2,3,7,8,9-HxCDD				
Total HxCDD				
1,2,3,4,6,7,8-HpCDD				
Total HpCDD				
Octa CDD				
Total PCDD				
Furans[a]				
2,3,7,8-TCDF				
Total TCDF				
1,2,3,7,8-PeCDF				
2,3,4,7,8-PeCDF				
Total PeCDF				
1,2,3,4,7,8-HxCDF				
1,2,3,6,7,8-HxCDF				
2,3,4,6,7,8-HxCDF				
1,2,3,7,8,9-HxCDF				
Total HxCDF				
1,2,3,4,6,7,8-HpCDF				
1,2,3,4,7,8,9-HpCDF				
Total HpCDF				
Octa CDF				
Total PCDF				
Total PCDD/PCDF				
Non-PAH HAPs				
Acetaldehyde	7.67E-04	0.00E+00	0.00E+00	**0.00E+00**
Acrolein	9.25E-05	0.00E+00	0.00E+00	0.00E+00
Benzene	9.33E-04	0.00E+00	0.00E+00	**0.00E+00**
1,3-Butadiene	3.91E-05	0.00E+00	0.00E+00	**0.00E+00**
Ethylbenzene				
Formaldehyde	1.18E-03	0.00E+00	0.00E+00	**0.00E+00**
Hexane				
Isooctane				
Methyl Ethyl Ketone				
Styrene				
Propionaldehyde				
Toluene				
Methyl chloroform				
Toluene[a]	4.09E-04	0.00E+00	0.00E+00	0.00E+00
Xylene	2.85E-04	0.00E+00	0.00E+00	0.00E+00
PAH, Total		0.00E+00		**0.00E+00**
POM (7 PAH Group)		0.00E+00	0.00E+00	**0.00E+00**

Pollutant	Emission Factor[a] (lb/MMBtu)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) Annual or 24-hr Average
Inorganic Gases				
Trifluoromethane				
2-Methylchloroethane[a]				
Acetaldehyde[a]	1.40E-06	0.00E+00	0.00E+00	**0.00E+00**
Acetonitrile[a]	6.00E-06	0.00E+00	0.00E+00	0.00E+00
Anthracene[a]	1.87E-08	0.00E+00	0.00E+00	**0.00E+00**
Benzo(a)anthracene[a]	1.68E-08	0.00E+00	0.00E+00	0.00E+00
Benzo(a)pyrene[a]	1.88E-07	0.00E+00	0.00E+00	0.00E+00
Benzo(b)fluoranthene[a]	9.91E-08	0.00E+00	0.00E+00	**0.00E+00**
Benzo(g,h,i)perylene				
Benzo(k)fluoranthene[a]	1.55E-07	0.00E+00	0.00E+00	**0.00E+00**
Benzo(e)pyrene[a]	4.15E-08	0.00E+00	0.00E+00	0.00E+00
Chrysene[a]	3.53E-07	0.00E+00	0.00E+00	**0.00E+00**
Dibenz(a,h)anthracene[a]	5.83E-07	0.00E+00	0.00E+00	**0.00E+00**
Dichlorobenzene				
Fluoranthene[a]	7.61E-08	0.00E+00	0.00E+00	0.00E+00
Fluorene[a]	2.92E-07	0.00E+00	0.00E+00	**0.00E+00**
Indeno(1,2,3-cd)pyrene[a]	3.75E-07	0.00E+00	0.00E+00	**0.00E+00**
Naphthalene[a] [h]	9.46E-05	0.00E+00	0.00E+00	0.00E+00
Perylene	2.56E-09	0.00E+00	0.00E+00	**0.00E+00**
Phenanthrene[a]	4.78E-06	0.00E+00	0.00E+00	**0.00E+00**
Pyrene[a]				
Non-HAP Organic Compounds				
Acenaphthene				
Acenaphthylene				
Acetone				
Benzaldehyde				
Cyclohexane[a]				
Ethane				
Heptane				
Hexane				
Isobutyraldehyde				
Methanol[a]				
2-Methyl-2-butene				
2-Methylpentane				
n-Decane				
n-Pentane				
Propionaldehyde				
Metals				
Antimony[a]				
Arsenic[a]				
Barium[a]				
Beryllium[a]				
Cadmium[a]				
Chromium[a]				
Cobalt[a]				
Copper[a]				
Hexavalent Chromium[a]				
Manganese[a]				
Mercury[a]				
Molybdenum[a]				
Nickel[a]				
Phosphorus[a]				
Silver[a]				
Selenium[a]				
Thallium[a]				
Vanadium[a]				
Zinc[a]				

Small Engine #2

Fuel Type Toggle = G 0 hp Engine
Fuel Consumption Rate 0.00 gal/hr
Calculated MMBtu/hr 0.0000 MMBtu/hr
Max Daily Operation hr/day
Max Annual Operation hr/yr

Pollutant	Emission Factor[a] (lb/MMBtu)	Emissions (lb/hr)	Emissions (T/yr)	TAPs Emissions (lb/hr) Annual or 24-hr Average
SO_2	n.a.	n.data	n.data	
SO_2 (< lowest [b])	n.data	n.data	n.data	
PM 2.5	0.000	0.000	0.00	
CO [c]	0.00	0.000	0.00	
NO_x	0.000	0.000	0.00	
SO_x [d] (total SOx presumed SO2)	0.00151S	0.000	0.000	
VOC [e] (total TOC [f] - CH_4 - VOC [c])	0.000	0.000	0.000	
Lead	S	lb/yr		
HCl [g]				
Dioxins[a]				
2,3,7,8-TCDD				
Total TCDD				
1,2,3,7,8-PeCDD				
Total PeCDD				
1,2,3,4,7,8-HxCDD				
1,2,3,6,7,8-HxCDD				
1,2,3,7,8,9-HxCDD				
Total HxCDD				
1,2,3,4,6,7,8-HpCDD				
Total HpCDD				
Octa CDD				
Total PCDD				
Furans[a]				
2,3,7,8-TCDF				
Total TCDF				
1,2,3,7,8-PeCDF				
2,3,4,7,8-PeCDF				
Total PeCDF				
1,2,3,4,7,8-HxCDF				
1,2,3,6,7,8-HxCDF				
2,3,4,6,7,8-HxCDF				
1,2,3,7,8,9-HxCDF				
Total HxCDF				
1,2,3,4,6,7,8-HpCDF				
1,2,3,4,7,8,9-HpCDF				
Total HpCDF				
Octa CDF				
Total PCDF				
Total PCDD/PCDF				
Non-PAH HAPs				
Acetaldehyde[a]	7.67E-04	0.00E+00	0.00E+00	**0.00E+00**
Acrolein[a]	9.25E-05	0.00E+00	0.00E+00	0.00E+00
Benzene[a]	9.33E-04	0.00E+00	0.00E+00	**0.00E+00**
1,3-Butadiene[a]	3.91E-05	0.00E+00	0.00E+00	**0.00E+00**
Ethylbenzene[a]				
Formaldehyde[a] [h]	1.18E-03	0.00E+00	0.00E+00	**0.00E+00**
Hexane[a]				
Isooctane[a]				
Methyl Ethyl Ketone[a]				
Styrene[a]				
Propionaldehyde[a]				
Toluene[a]				
Methyl chloroform[a]				
Toluene[a]	4.09E-04	0.00E+00	0.00E+00	0.00E+00
Xylene[a]	2.85E-04	0.00E+00	0.00E+00	0.00E+00
PAH, Total		0.00E+00		**0.00E+00**
POM (7 PAH Group)		0.00E+00	0.00E+00	**0.00E+00**

Combined Emissions of Small Engines

Pollutant	Total Emissions (lb/hr)	Total Emissions (T/yr)
SO_2	n.data	n.data
SO_2 (< lowest [b])	n.data	n.data
PM 2.5	0.000	0.00
CO [c]	0.000	0.00
NO_x	0.000	0.00
SO_x [d] (total SOx presumed SO2)	0.000	0.00
VOC [e] (total TOC [f] - CH_4 - VOC [c])	0.000	0.00
Lead		0.00E+00
HCl [g]		0.00E+00
Dioxins[a]		
2,3,7,8-TCDD		0.00E+00
Total TCDD		0.00E+00
1,2,3,7,8-PeCDD		0.00E+00
Total PeCDD		0.00E+00
1,2,3,4,7,8-HxCDD		0.00E+00
1,2,3,6,7,8-HxCDD		0.00E+00
1,2,3,7,8,9-HxCDD		0.00E+00
Total HxCDD		0.00E+00
1,2,3,4,6,7,8-HpCDD		0.00E+00
Total HpCDD		0.00E+00
Octa CDD		0.00E+00
Total PCDD		0.00E+00
Furans[a]		
2,3,7,8-TCDF		
Total TCDF		
1,2,3,7,8-PeCDF		
2,3,4,7,8-PeCDF		
Total PeCDF		
1,2,3,4,7,8-HxCDF		
1,2,3,6,7,8-HxCDF		
2,3,4,6,7,8-HxCDF		
1,2,3,7,8,9-HxCDF		
Total HxCDF		
1,2,3,4,6,7,8-HpCDF		
1,2,3,4,7,8,9-HpCDF		
Total HpCDF		
Octa CDF		
Total PCDF		
Total PCDD/PCDF		
Non-PAH HAPs		
Acetaldehyde	0.00E+00	0.00E+00
Acrolein	0.00E+00	0.00E+00
Benzene	0.00E+00	0.00E+00
1,3-Butadiene	0.00E+00	0.00E+00
Ethylbenzene		
Formaldehyde	0.00E+00	0.00E+00
Hexane		
Isooctane		
Methyl Ethyl Ketone		
Styrene		
Propionaldehyde		
Toluene		
Methyl chloroform		
Toluene	0.00E+00	0.00E+00
Xylene	0.00E+00	0.00E+00
PAH, Total	0.00E+00	0.00E+00
POM (7 PAH Group)	0.00E+00	0.00E+00

Pollutant	Total Emissions (lb/hr)	Total Emissions (T/yr)
Inorganic Gases		
Trifluoromethane		
2-Methylchloroethane		
Acetaldehyde	0.00E+00	0.00E+00
Acetonitrile	0.00E+00	0.00E+00
Anthracene	0.00E+00	0.00E+00
Benzo(a)anthracene	0.00E+00	0.00E+00
Benzo(a)pyrene	0.00E+00	0.00E+00
Benzo(b)fluoranthene	0.00E+00	0.00E+00
Benzo(g,h,i)perylene		
Benzo(k)fluoranthene	0.00E+00	0.00E+00
Benzo(e)pyrene	0.00E+00	0.00E+00
Chrysene	0.00E+00	0.00E+00
Dibenz(a,h)anthracene	0.00E+00	0.00E+00
Dichlorobenzene		
Fluoranthene	0.00E+00	0.00E+00
Fluorene	0.00E+00	0.00E+00
Indeno(1,2,3-cd)pyrene	0.00E+00	0.00E+00
Naphthalene	0.00E+00	0.00E+00
Perylene	0.00E+00	0.00E+00
Phenanthrene	0.00E+00	0.00E+00
Pyrene	0.00E+00	0.00E+00
Non-HAP Organic Compounds		
Acenaphthene		
Acenaphthylene		
Acetone		
Benzaldehyde		
Cyclohexane		
Ethane		
Heptane		
Hexane		
Isobutyraldehyde		
Methanol		
2-Methyl-2-butene		
2-Methylpentane		
n-Decane		
n-Pentane		
Propionaldehyde		
Metals		
Antimony		
Arsenic		
Barium		
Beryllium		
Cadmium		
Chromium		
Cobalt		
Copper		
Hexavalent Chromium		
Manganese		
Mercury		
Molybdenum		
Nickel		
Phosphorus		
Silver	0.00E+00	0.00E+00
Selenium	0.00E+00	0.00E+00
Thallium		
Vanadium		
Zinc	0.00E+00	0.00E+00

a) Emission factors are from AP-42
b) AP-42, Table 3.3-1, Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines, 10/96
c), d), e), f), g) AP-42, Table 3.3-2, Uncontrolled Pollutant Emission Factors for Uncontrolled Diesel Engines, Emission Factor Rating: A/NA
h) (reserved)
i) EIAPA Toxic Air Pollutant
TAPs lb/hr rates are 24-hr averages except for those in bold text. Lb/hr rates for bold TAPs (carcinogens) are annual averages.

Facility: P.W. Feenstra Construction, Inc.

2/25/2022 9:07 Permit/Facility ID: P-2021.0054 Project 62753 777-00643

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	120000	lb/MMscf	AP-42 Table 1.4-2	0.00	1	0.00
Methane	2.3	lb/MMscf	AP-42 Table 1.4-2	0.00E+00	21	0.00E+00
N_2O	2.2	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	120000	lb/MMscf	AP-42 Table 1.4-2	0.00	1	0.00
Methane	2.3	lb/MMscf	AP-42 Table 1.4-2	0.00E+00	21	0.00E+00
N_2O	2.2	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			269.78	1	269.78
Methane	1	lb/10^3 gal	AP-42 Table 1.3-3	1.02E-02	21	2.15E-01
N_2O	0.53	lb/10^3 gal	AP-42 Table 1.3-8	5.42E-03	310	1.68E+00

* Assumes a fuel heating value of 0.137 MMBtu/gal, a density of 7.2 lb/gal, a 44:12 CO2 to CO MW ratio and a heater with a rating of 2.8 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			0.00	1	0.00
Methane	1	lb/10^3 gal	AP-42 Table 1.3-3	0.00E+00	21	0.00E+00
N_2O	0.53	lb/10^3 gal	AP-42 Table 1.3-8	0.00E+00	310	0.00E+00

* Water Heater #2 does not burn Diesel.

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	14300	lb/10^3 gal	AP-42 Table 1.5-1	0.00	1	0.00
Methane	0.9	lb/10^3 gal	AP-42 Table 1.5-1	0.00E+00	21	0.00E+00
N_2O	0.2	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	14300	lb/10^3 gal	AP-42 Table 1.5-1	0.00	1	0.00
Methane	0.9	lb/10^3 gal	AP-42 Table 1.5-1	0.00E+00	21	0.00E+00
N_2O	0.2	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	269.78
Methane	0.21
N_2O	1.68
Total[1]	**272**

Facility: **P.W. Feenstra Construction, Inc.**
2/25/2022 9:07 **Permit/Facility ID:** **777-00643** **P-2021.0054 Project 62753**

Max Hourly Production	150	cy/hr	**82%** T/hr is Aggregate =	**123**	**cy/hr**
Max Daily Production	2,000	cy/day	82% T/hr is Aggregate =	**1,640**	**cy/day**
Max Annual Production	35,000	cy/yr	82% T/hr is Aggregate =	**28,700**	**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: **123** **cy/hr** **2** 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	0.060	0.033	6.99E-03	1.60E-03	0.120	0.067	1.40E-02	3.19E-03
PM-10 (total)	7.00E-04	0.028	0.016	3.26E-03	7.45E-04	0.056	0.031	6.52E-03	1.49E-03
PM-2.5 (total)	2.25E-04	0.009	0.005	1.05E-03	4.59E-03	0.018	0.010	2.10E-03	9.18E-03

0.186

1.256

Coarse Aggegate Transfer to Conveyor

Transfer from truck to conveyor: **123** **cy/hr** **2** 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	0.331	0.184	3.86E-02	8.82E-03	0.662	0.368	7.73E-02	1.76E-02
PM-10 (total)	3.10E-03	0.160	0.089	1.87E-02	4.27E-03	0.321	0.178	3.74E-02	8.55E-03
PM-2.5 (total)	9.60E-04	0.050	0.028	5.80E-03	2.54E-02	0.099	0.055	1.16E-02	5.08E-02

Final Concrete Batch Plant Emissions Inventory

Listed Below are the emissions estimates for the units selected.

Company:	**P.W. Feenstra Construction, Inc.**
Facility ID:	**777-00643**
Permit No.:	**P-2021.0054 Project 62753**
Source Type:	**Portable Concrete Batch Plant**
Manufacturer/Model:	**CON-E-CO/327D**

Production

Maximum Hourly Production Rate:	150	cy/hr
Proposed Daily Production Rate:	2000	cy/day
Proposed Maximum Annual Production Rate:	35000	cy/year

Tons/year

Emissions Units		$PM_{2.5}$	PM_{10}	SO_2	NO_x	CO	VOC	Lead	THAPs	CO_2e
CBP Type:	**Truck Mix**	0.208	0.35	NA	NA	NA	NA	1.42E-05		N/A
Water Heater #1:	**Water Heater #1**	0.018	0.033	2.16E-03	0.200	0.050	0.006	1.26E-05		272
Water Heater #2:	**No Water Heater**	0.000	0.000	0.00E+00	0.000	0.000	0.000	0.00E+00		0
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)	**0.23**	**0.38**	**2.16E-03**	**0.20**	**0.05**	**0.01**	**2.68E-05**	**1.12E-02**	**272**

Pounds/hour

		$PM_{2.5}$	PM_{10}	SO_2	NO_x	CO	VOC	Lead	THAPs
CBP Type:	**Truck Mix**	0.993	1.67	NA	NA	NA	NA	4.15E-05	
Water Heater #1:	**Water Heater #1**	0.036	0.066	4.32E-03	0.400	0.100	0.011	2.52E-05	
Water Heater #2:	**No Water Heater**	0.000	0.000	0.00E+00	0.000	0.000	0.000	0.00E+00	
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)	**1.03**	**1.73**	**4.32E-03**	**0.40**	**0.10**	**0.01**	**6.67E-05**	**2.29E-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	**4.87E-06**	**1.59E-05**	Annual	1.50E-06	**Yes**
Barium		X	**0.00E+00**	**0.00E+00**	24-hour	3.30E-02	**No**
Beryllium	X	X	**1.04E-06**	**4.70E-07**	Annual	2.80E-05	**No**
Cadmium	X	X	**1.20E-06**	**1.16E-06**	Annual	3.70E-06	**No**
Cobalt	X	X	**0.00E+00**	**0.00E+00**	24-hour	3.30E-03	**No**
Copper		X	**9.80E-06**	**4.90E-06**	24-hour	1.30E-02	**No**
Chromium	X	X	**9.74E-05**	**1.74E-05**	24-hour	3.30E-02	**No**
Manganese	X	X	**3.77E-04**	**8.11E-05**	24-hour	3.33E-01	**No**
Mercury	X	X	**4.90E-06**	**2.45E-06**	24-hour	N/A	**No**
Molybdenum (soluble)		X	**0.00E+00**	**0.00E+00**	24-hour	3.33E-01	**No**
Nickel	X	X	**4.68E-06**	**1.64E-05**	Annual	2.70E-05	**No**
Phosphorus	X	X	**2.98E-04**	**4.96E-05**	24-hour	7.00E-03	**No**
Selenium	X	X	**4.01E-05**	**1.55E-05**	24-hour	1.30E-02	**No**
Vanadium		X	**0.00E+00**	**0.00E+00**	24-hour	3.00E-03	**No**
Zinc		X	**6.53E-06**	**3.27E-06**	24-hour	6.67E-01	**No**
Chromium VI	X	X	**7.43E-07**	**3.25E-06**	Annual	5.60E-07	**Yes**
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	**4.89E-07**	**5.58E-08**	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	**7.42E-07**	**3.71E-07**	24-hour	29	**No**
Formaldehyde	X	X	**7.53E-05**	**8.60E-06**	Annual	5.10E-04	**No**
Hexane	X	X	**2.10E-02**	**1.05E-02**	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	**7.23E-05**	**3.62E-05**	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	**4.82E-08**	**5.50E-09**	Annual	9.10E-05	**No**
Acenaphthylene	X	X	**5.87E-10**	**6.70E-11**	Annual	9.10E-05	**No**
Anthracene	X	X	**2.79E-09**	**3.18E-10**	Annual	9.10E-05	**No**
Benzo(a)anthracene	X	X	**9.16E-09**	**1.05E-09**	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	**3.38E-09**	**3.86E-10**	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	**5.16E-09**	**5.89E-10**	Annual	9.10E-05	**No**
Benzo(k)fluoranthene	X	X	**0.00E+00**	**0.00E+00**	Annual	2.00E-06	**No**
Chrysene	X	X	**5.43E-09**	**6.20E-10**	Annual	2.00E-06	**No**
Dibenzo(a,h)anthracene	X	X	**3.81E-09**	**4.35E-10**	Annual	2.00E-06	**No**
Dichlorobenzene	X	X	**0.00E+00**	**0.00E+00**	Annual	9.10E-05	**No**
Fluoranthene	X	X	**1.11E-08**	**1.26E-09**	Annual	9.10E-05	**No**
Fluorene	X	X	**1.02E-08**	**1.17E-09**	Annual	9.10E-05	**No**
Indeno(1,2,3-cd)pyrene	X	X	**4.89E-09**	**5.58E-10**	Annual	2.00E-06	**No**
Naphthalene (24-hour)	X	X	**9.42E-04**	**4.71E-04**	24-hour	3.33	**No**
Naphthalene (Annual)	X	X	**2.58E-06**	**2.95E-07**	Annual	9.10E-05	**No**
Perylene	X		**0.00E+00**	**0.00E+00**	N/A	N/A	**N/A**
Phenanathrene	X	X	**2.40E-08**	**2.74E-09**	Annual	9.10E-05	**No**
Pyrene	X	X	**9.70E-09**	**1.11E-09**	Annual	9.10E-05	**No**
PAH HAPs Total	X	X	**2.67E-08**		Annual	2.00E-06	**No**
7-PAH Group (586 listed TAP)	X	X	**2.67E-08**	**3.04E-09**	Annual	2.00E-06	**No**

Total HAPs Emissions (lb/hr) and (T/yr): 2.29E-02 1.12E-02

Uncontrolled Criteria Pollutants

Source	PM10/PM2.5		SO2		NOx		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Concrete Batch Plant	1.68E-02	7.37E-02	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Water Heater #1	6.60E-02	3.30E-02	4.32E-03	2.16E-03	4.00E-01	2.00E-01	1.00E-01	5.00E-02	1.11E-02	5.56E-03
Water Heater #2	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
Small Diesel Engine	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
Large Diesel Engine	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

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

Facility: P.W. Feenstra Construction, Inc.
2/25/2022 9:07 **Permit** P-2021.0054 Project 62753 **Facility ID:** 777-00643

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	14	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	14	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	14	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: January 24, 2022

TO: Morrie Lewis, Permit Writer, Air Program

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

PROJECT: P-2021.0054 Project 62753 – Initial Permit to Construct (PTC) for the P.W. Feenstra Construction, Inc. Portable Concrete Batch Plant.

SUBJECT: Demonstration of Compliance with IDAPA 58.01.01.203.02 (NAAQS) and 203.03 (TAPs) as it relates to air quality impact analyses – Criteria Pollutant Modeling Exemption and TAPs Modeling Exemption

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Acronyms, Units, and Chemical Nomenclature

AAC	Acceptable Ambient Concentration of a non-carcinogenic TAP
AACC	Acceptable Ambient Concentration of a Carcinogenic TAP
Appendix W	40 CFR 51, Appendix W – Guideline on Air Quality Models
BRC	Below Regulatory Concern
CFR	Code of Federal Regulations
CMAQ	Community Multi-Scale Air Quality modeling system
CO	Carbon Monoxide
DEQ	Idaho Department of Environmental Quality
EL	Screening Emission Level of a TAP
EPA	United States Environmental Protection Agency
Feenstra	P.W. Feenstra Construction, Inc.
Idaho Air Rules	Rules for the Control of Air Pollution in Idaho, located in the Idaho Administrative Procedures Act 58.01.01
lb/hr	Pounds per hour
lb/yr	Pounds per year
NAAQS	National Ambient Air Quality Standards
NO_2	Nitrogen Dioxide
NOx	Oxides of Nitrogen
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 billion
PTC	Permit to Construct
PTE	Potential to Emit
SER	Significant Emission Rate
SIL	Significant Impact Level
SO_2	Sulfur Dioxide
TAP	Toxic Air Pollutant
VOCs	Volatile Organic Compounds
$\mu g/m^3$	Micrograms per cubic meter of air

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1.0 Summary

P.W. Feenstra Construction, Inc (Feenstra) submitted an initial Permit to Construct (PTC) application for a new portable concrete batch plant (CBP). 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. Facility-wide emissions of all criteria pollutants were below levels defined as Below Regulatory Concern (BRC), so NAAQS compliance demonstrations were not required. TAP impact analyses were not required for permit issuance because allowable emissions associated with operations of the facility were below applicable TAP screening emission levels (ELs). This memorandum provides a summary of the applicability assessment for analyses used to demonstrate compliance with applicable NAAQS and TAP increments, as required by *Idaho Air Rules* Section 203.02 and 203.03.

Feenstra prepared the PTC application for this project and DEQ calculated potential emissions and evaluated those emissions for applicability of requirements to demonstrate compliance with applicable NAAQS and TAP increments. 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, in combination with DEQ's analyses: 1) utilized appropriate methods and models; 2) was conducted using reasonably accurate or conservative model parameters and input data (review of emissions estimates was addressed by the DEQ permit writer); 3) adhered to established DEQ guidelines for new source review dispersion modeling; 4) showed either a) that estimated potential/allowable emissions are at a level defined as below regulatory concern (BRC) and do not require a NAAQS compliance demonstration; b) that predicted pollutant concentrations from emissions associated with the project as modeled were below Significant Impact Levels (SILs) or other applicable regulatory thresholds; or c) that predicted pollutant concentrations from emissions associated with the project as modeled, when appropriately combined with co-contributing sources and background concentrations, were below applicable NAAQS at ambient air locations where and when the project has a significant impact; 5) showed that TAP emissions 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 the requirements of *Appendix W* are met regarding emissions representative of design capacity or permit allowable rates.

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Summary of Submittals and Actions

November 18, 2021 Application received by DEQ.
December 17, 2021 Application determined complete by DEQ.

Table 1. KEY ASSUMPTIONS USED IN MODELING ANALYSES	
Criteria/Assumption/Result	**Explanation/Consideration**
General Criteria Pollutant Emissions Rates The final emission inventory indicates that facility-wide emissions of all criteria pollutants are at levels considered BRC, and as such, NAAQS compliance demonstrations are not required for permit issuance. Criteria air pollutant emissions rates used in the air permitting analyses, as listed in the permit application and DEQ Statement of Basis, must represent maximum potential emissions as given by design capacity, inherently limited by the nature of the process or configuration of the facility, or as limited by the issued permit for the specific pollutant. BRC is evaluated for emissions only on an annual-averaged basis and only for non-fugitive emissions. Permit restrictions on averaging periods shorter than annual are not necessary to assure emissions are below BRC thresholds.	A NAAQS compliance demonstration may be required for applicable facility-wide emissions rates greater than BRC thresholds.
Relocation Requirement The CBP will not remain at any site for an operational period exceeding five years.	Compliance with TAP increments was demonstrated by applying the short-term adjustment factor to appliable ELs, as provided by *Idaho Air Rules* Section 210.15.
TAP Emissions Sources Allowable TAP emissions associated with operation of the facility are below applicable ELs, after adjustment short-term sources, for all non-carcinogenic and carcinogenic TAPs. TAP emissions must be accurately assessed by the DEQ permit writer, with the project's emissions remaining below ELs.	A factor of 10 may be applied to carcinogenic TAP ELs for sources that will operate at a site for less than five years, as provided in *Idaho Air Rules* Section 210.15. Where applicable emissions of a TAP exceed ELs or 10 X ELs for carcinogenic ELs, impact modeling must be performed to demonstrate compliance with TAP increments.

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2.0 Background Information

Background information on the project and emissions was provided in the application.

2.1 Project Description

The PTC application is for operations of a new portable CBP. The emission sources include:

- Loading cement and cement supplement into a storage silo (controlled by a fabric filter);
- Handling of sand and aggregate, with emissions from a weigh batcher captured and controlled by a baghouse;
- Loading of cement and aggregate into a cement truck, with emissions captured and controlled by a baghouse.

No other emission sources are described in the application.

2.2 Air Impact Analyses Required for All Permits to Construct

Criteria pollutant and TAP impact analysis requirements for a PTC are addressed in *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).*

2.3 Significant Impact Level and Cumulative NAAQS Impact Analyses

The 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 according to 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 emissions 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 impacts to ambient air (typically the design values consistent with the form of the standard) from facility-wide 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

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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.

Table 2. APPLICABLE REGULATORY LIMITS

Pollutant	Averaging Period	Significant Impact Levels[a] (µg/m^3)[b]	Regulatory Limit[c] (µg/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 µg/m^3)	75 ppb[p] (196 µg/m^3)	Mean of maximum 4th highest[q]
	3-hour	25	1,300[m]	Maximum 2nd highest[n]
Nitrogen Dioxide (NO_2)	1-hour	4 ppb (7.5 µg/m^3)	100 ppb[r] (188 µg/m^3)	Mean of maximum 8th highest[s]
	Annual	1.0	100[t]	Maximum 1st highest[n]
Lead (Pb)	3-month[u]	NA	0.15[t]	Maximum 1st highest[n]
	Quarterly	NA	1.5[t]	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. 3-year mean of the upper 98th percentile of the annual distribution of maximum daily 1-hour concentrations.
s. 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.
t. Not to be exceeded in any calendar year.
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.

If the cumulative NAAQS impact analysis indicates a violation of the standard, the permit may not be issued if the proposed project contributes (usually defined as impacts exceeding the SIL) to the modeled violation. This evaluation is made specific to both time and space. As an example, consider a hypothetical case where the SIL analysis indicates the project (new source or modification) has impacts exceeding the SIL and the cumulative impact analysis indicates a violation of the NAAQS. If project-specific impacts are below the SIL at the specific receptors showing the violations during the times when

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modeled violations occurred, 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 (DEQ, 2014) (see Section 3.1.1 of this memorandum); 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.

2.4 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 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.*

Per Section 210, if the total project-wide emissions 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 emissions 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 210.15 allows a short-term adjustment factor of 10 to be applied to carcinogenic TAP ELs or AACCs. This factor can be used for sources that will operate at a site for no more than five years.

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.

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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.

3.1 Emission Source Data

Emissions increases of criteria pollutants and TAPs resulting from the proposed project were estimated by DEQ for the 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 assuring that potential emission rates provided in the emission inventory are properly used in the modeling applicability assessment. The rates listed must represent the maximum allowable rate as averaged over the specified period.

Emission rates used in the impact modeling applicability analyses, as listed in this memorandum, should be reviewed by the DEQ permit writer and compared with those in the final emission inventory. All criteria air pollutant and TAP emission rates listed in Section 3.1.1 of this memorandum must be equal to or greater than the facility's potential emissions calculated in the PTC emission inventory or proposed permit allowable emission rates.

3.1.1 Modeling Applicability and Modeled Criteria Pollutant Emissions Rates

A criteria pollutant-specific NAAQS compliance demonstration may not be required where facility-wide potential to emit (PTE) values for that criteria pollutant would qualify for a BRC permit exemption as per *Idaho Air Rules* Section 221 (equal to 10 percent of the emissions defined as significant) if it were not for potential emissions of other criteria pollutants or TAPs. DEQ's regulatory interpretation policy of exemption provisions of *Idaho Air Rules* is: "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" (DEQ 2014). The interpretation policy also states that the exemption criteria of uncontrolled PTE not to exceed 100 ton/year (*Idaho Air Rules* Section 220.01.a.i) is not applicable when evaluating whether a NAAQS impact analysis 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 cases where a PTC is required (a modification as per *Idaho Air Rules* Section 005.68) for the action regardless of emissions quantities, such as the modification of an existing emissions or throughput limit.

The DEQ emission inventory asserts that facility-wide controlled PTE emissions of all criteria pollutants are below BRC levels, as listed in Table 3. Fugitive emissions, as defined in *Idaho Air Rules* Section 005.47, are not considered in determining whether a source meets the applicable exemption criteria unless required by federal law, as stated in *Idaho Air Rules* Section 220.01. Emissions from the handling of aggregate and sand by loaders and conveyors are fugitive in nature and were not considered in the emissions for BRC evaluation.

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Table 3. CRITERIA POLLUTANT NAAQS COMPLIANCE DEMONSTRATION APPLICABILITY			
Criteria Pollutant	**BRC Level (ton/year)**	**Applicable Facility Wide PTE Emissions[a] (ton/year)**	**Air Impact Analyses Required?**
PM_{10}	1.5	0.38	No
$PM_{2.5}$	1.0	0.23	No
Carbon Monoxide (CO)	10.0	0.050	No
Sulfur Dioxide (SO_2)	4.0	0.0022	No
Nitrogen Oxides (NOx)	4.0	0.20	No
Lead (Pb)	0.06	0.00020	No
Ozone (as VOC)	4.0	0.0056	No

[a.] Fugitive emissions are excluded from consideration as per *Idaho Air Rules*.

3.1.2 Toxic Air Pollutant Emissions Rates

The submitted application indicated that the facility would not remain at any location for more than one year. Compliance with TAP increments for the proposed project was demonstrated by applying the short-term adjustment factor to ELs for carcinogenic TAPs in *Idaho Air Rules* Section 586, as provided by *Idaho Air Rules* Section 210.15. Emissions of all carcinogenic TAPs were less than 10 times the ELs (allowable limit for short-term sources) and emissions of all noncarcinogenic TAPs were less than ELs.

4.0 Conclusions

The information submitted with the PTC application and DEQ's analyses demonstrated to DEQ's satisfaction that applicable allowable emissions resulting from the proposed facility will not cause or significantly contribute to a violation of any ambient air quality standard or TAP increment.

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References

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

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APPENDIX C – FACILITY DRAFT COMMENTS

The facility responded on February 23, 2022, that they did not have questions regarding the contents of the permit or statement of basis.

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:	**P. W. Feenstra Construction, Inc. - 00643**
Address:	**18521 E Queen Creek Road, Ste 105-480**
City:	**Queen Creek**
State:	**Arizona**
Zip Code:	**85142**
Facility Contact:	**Darryl Van Grouw**
Title:	**Batch Plant Supervisor**
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	0.2	0	0.2
SO_2	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.4	0	0.4
VOC	0.0	0	0.0
Total:	0.6	0	**0.6**
Fee Due	**$ 500.00**		

Comments: