



State of Idaho  
Department of Environmental Quality  
Air Quality Division

**AIR QUALITY PERMIT  
STATEMENT OF BASIS**

**TII Operating Permit No. T2-2008.0054  
Final**

**C. Wright Construction, Inc.  
Meridian, Idaho  
Facility ID No. 001-00019**

**October 6, 2008**

A handwritten signature in black ink, appearing to read "R. Baldwin".

**Robert Baldwin  
Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01.400, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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## Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
hp	horsepower
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Available Control Technology
MMBtu	Million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O <sub>3</sub>	ozone
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	Permit to Construct
PTE	Potential to Emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/yr	Tons per year
µg/m <sup>3</sup>	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

## STATEMENT OF BASIS

<b>Permittee:</b>	C. Wright Construction, Inc.	<b>Permit No.:</b> T2-2008.0054
<b>Location:</b>	Meridian, Idaho	<b>Facility ID No.</b> 001-00019

### 1. FACILITY DESCRIPTION

This facility is a gravel mining, crushing, and screening facility. The maximum hourly throughput of the crushing and screening plant is 550 T/hr. The allowable throughput for the facility is 13,200 T/day and 600,000 T/yr. Electricity is supplied to the facility by the local utility.

### 2. APPLICATION SCOPE

This permitting action is a renewal of the existing Tier II operating permit T2- 030055, issued May 13, 2005.

The fugitive emissions limit, though not practically enforceable, remains in the permit since those limits were used in the modeling for the Northern Ada County PM<sub>10</sub> Maintenance Area.

#### 2.1 *Application Chronology*

April 11, 2008	DEQ received the Tier II renewal application
April 17, 2008	DEQ declared Tier II renewal application incomplete
April 22, 2008	DEQ received a second Tier II renewal application
May 22, 2008	DEQ declared the second Tier II renewal application complete
July 22, 2008	DEQ sent a draft permit for facility review
September 3, 2008	DEQ resent a draft permit for facility review

### 3. TECHNICAL ANALYSIS

Emission Unit and Control Device

**Table 3.1 EMISSION UNIT AND CONTROL DEVICE INFORMATION**

Emission Unit /ID No.	Description	Control Device
Hot Asphalt Plant	Combining dried aggregate and hot oil to produce asphaltic concrete	Scrubber
Associated Processes	Crushing, screening, hauling, mining, loading and unloading	Reasonable control

#### 3.1 *Emissions Inventory*

There is no increase in emissions associated with this permit renewal; therefore, a new emissions inventory is not required.

#### 3.2 *Ambient Air Quality Impact Analysis*

There is no increase in emissions associated with this permit renewal; therefore, modeling is not required.

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### 4. REGULATORY REVIEW

#### 4.1 *Attainment Designation (40 CFR 81.313)*

The facility is located in Ada County which is designated as attainment or unclassifiable for PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>2</sub>, SO<sub>x</sub>, and Ozone. Reference 40 CFR 81.313.

#### 4.2 *Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)*

C. Wright Construction, Inc. is not subject to a Title V classification.

#### 4.3 *NSPS Applicability (40 CFR 60)*

C. Wright Construction, Inc. has two sources that are subject to NSPS. The skimmer screen deck (1986 project) and the stand-alone screen deck (1997 project) shall not exhibit greater than 10 % opacity as required by CFR 60.762(b). The opacity shall be determined using the procedure specified in IDAPA 58.01.01.625.04.

#### 4.4 *NESHAP Applicability (40 CFR 61)*

C. Wright Construction, Inc. is not subject to NESHAP.

#### 4.5 *MACT Applicability (40 CFR 63)*

C. Wright Construction, Inc. is not subject to MACT.

#### 4.6 *CAM Applicability (40 CFR 64)*

C. Wright Construction, Inc. is not subject to CAM.

#### 4.7 *Permit Conditions Review*

- 4.7.1 Existing permit Condition Permit Condition 2.6 is renumbered as renewal Permit Condition 2.5.
- 4.7.2 Existing permit Condition Permit Condition 2.7 is renumbered as renewal Permit Condition 2.6. Method 22 has been deleted from facility-wide conditions.
- 4.7.3 Existing permit Condition Permit Condition 2.8 is renumbered as renewal Permit Condition 2.7.
- 4.7.4 Existing permit Condition Permit Condition 2.9 is renumbered as renewal Permit Condition 2.8.
- 4.7.5 Existing permit Condition Permit Condition 2.10 regarding Excess Emissions has been deleted from facility-wide conditions.
- 4.7.6 Existing permit Condition Permit Condition 2.11 is renumbered as renewal Permit Condition 2.9.
- 4.7.7 Existing permit Condition Permit Condition 2.12 regarding Performance Testing has been deleted from facility-wide conditions.

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- 4.7.8 Existing permit Condition Permit Condition 2.12 regarding Air Stagnation Advisory Day has been deleted from facility-wide conditions.
- 4.7.9 Existing permit Condition Permit Condition 2.15 is renumbered as renewal Permit Condition 2.10.
- 4.7.10 Existing permit Condition Permit Condition 2.16 is renumbered as renewal Permit Condition 2.11.
- 4.7.11 Existing permit Condition Permit Condition 2.17 is renumbered as renewal Permit Condition 2.12.
- 4.7.12 The current Facility-wide conditions template was added to the renewal Tier II operating permit.
- 4.7.13 The current General Provisions template was added to the renewal Tier II operating permit.

### 5. FEE REVIEW

The emission limit stated in Permit Condition 3.3 and 4.2 total 32.8 tons of PM<sub>10</sub> per any consecutive 12-calendar month period. This total includes 31 T/yr of fugitive emissions. IDAPA 58.01.01.407 states the fee calculation shall not include fugitive emissions. However, PM<sub>10</sub> emissions of 1.8 T/yr are from a point source and subject to fees.

A Tier II operating permit processing fee must be paid to DEQ in accordance with IDAPA 58.01.01.407 by the permittee receiving a Tier II operating permit. C. Wright Construction, Inc.'s fee is \$2,500 because it is in the category of stationary source or facility with permitted emissions of one to less than ten tons per year, as shown in Table 5.1. The processing fee is payable upon receipt of an assessment from DEQ at the time of permit issuance. Failure to submit the Tier II operating permit processing fee within forty-five (45) days of receipt of an assessment by the Department will result in a monthly accrual of interest in the amount of twelve percent (12%) per annum on the outstanding balance until the fee is paid in full (IDAPA 58.01.01.408.02).

**Table 5.1 TIER II PROCESSING FEE TABLE**

Emissions Inventory	
Pollutant	Permitted Emissions (T/yr)
NO <sub>x</sub>	
SO <sub>2</sub>	
CO	
PM <sub>10</sub>	1.8
VOC	
TAPs/HAPs	
Total:	1.8
Fee Due	\$ 2,500.00

### 6. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.404.04, a public comment period is not required because the proposed project is a permit renewal with no authorized increase in allowable emissions.

REB/hp                      Permit No. T2-2008.0054

## **APPENDIX A – AIRS INFORMATION**

## AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM

**Facility Name:** C. Wright Construction Inc.  
**Facility Location:** Meridian, Idaho  
**AIRS Number:** 001-00019

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION
								A-Attainment U-Unclassified N- Nonattainment
SO <sub>2</sub>	B		B					U
NO <sub>x</sub>	B		B					U
CO	B		B					U
PM <sub>10</sub>	SM		SM					U
PT (Particulate)								
VOC	B		B					U
THAP (Total HAPs)								
			APPLICABLE SUBPART					
			OOO					

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

## **APPENDIX B – EMISSIONS INVENTORY**

The calculations of the emissions shown for the hot-asphalt plant in the table below were determined using the permit limit of 80,000 tons of asphalt product and the emission rates stated in AP-42 under Hot-Asphalt Plants. These quantities are for the Emission Inventory only and are not permit limits stated within the permit.

**TABLE 3.2 WORST-CASE FACILITY WIDE EMISSION ESTIMATES**

Emission Unit	PM <sub>10</sub>	NO <sub>x</sub>	CO	VOC	SO <sub>2</sub>
	T/yr	T/yr	T/yr	T/yr	T/yr
Hot-Asphalt Plant	1.8	1.0	16	0.33	0.18
Associated Process	31				
<b>TOTAL</b>	<b>32.8</b>	<b>1.0</b>	<b>16</b>	<b>0.33</b>	<b>0.18</b>

Tons per consecutive 12-calendar month period

**3.3 TAP AND HAP EMISSIONS SUMMARY**

TAPs	Annual Average
	lb/yr
Ethylbenzene	176
Toluene	80
Xylene	216
HAPs	Annual Average
	lb/yr
Acetaldehyde	25.6
Benzene	22.4
Formaldehyde	59.2