



State of Idaho  
Department of Environmental Quality  
Air Quality Division

**AIR QUALITY PERMIT  
STATEMENT OF BASIS**

Tier II Operating Permit No. T2-2008.0059

Final

Clements Concrete Company  
(formerly Mike's Sand and Gravel)

Boise, Idaho

Facility ID No. 001-00184

February 19, 2009

Harbi Elshafei *H.E.*

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.

## **1. FACILITY INFORMATION**

### **1.1 Permitting Action and Facility Permitting History**

This Tier II operating permit (T2) is for a change in ownership name of the facility existing permit number T2-2007.0122 from Mike's Sand and Gravel to Clements Concrete Company. The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

- November 20, 2007 T2-2007.0122, renewal of Tier II operating permit. The permit expires on November 20, 2012. (A, however, the status will become "S" upon issuance of this permit).
- February 10, 2005 T2-040030, permit revision changing the name of the ownership of the facility and deleting the requirements in the existing permit related to 40 CFR 60, Subpart OOO. (S)
- July 12, 2002 T2-000038, initial facility-wide T2 permit. (S)

## **2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY**

### **2.1 Application Scope**

This permit is a revision of the facility's currently effective Tier II operating permit. The revision is to change the name of the facility from Mike's Sand and Gravel located in Boise, Idaho to Clements Concrete Company. The facility's contact and the responsible official remain the same as in the current permit.

### **2.2 Application Chronology**

- April 10, 2008 DEQ received application for the name change of the facility from Mike's Sand and Gravel to Clements Concrete Company.
- May 19, 2008 Supplemental information received from Clements.

## **3. REGULATORY REVIEW**

### **3.1 Permit Revision**

This permit is for a revision of Tier II operating permit in accordance with IDAPA 58.01.01.404.04 to change the name of the facility from Mike's Sand and Gravel to Clements Concrete Company. No request to change to the company's contact or to the company's responsible official.

The permit is identified in 40 CFR 52.670(d), Subpart N in the Northern Ada County PM<sub>10</sub> Maintenance Plan. As such, DEQ has made changes in the revised permit to include the new ownership of the facility and also provided the name of the previous owner (i.e., Mike's Sand and Gravel) between parentheses to match it with the current listing in 40 CFR 52.670(d).

All permit conditions that are associated with the Maintenance Plan of the State Implementation Plan (SIP) are not changed in this permitting action. However, some minor changes to the permit are made to clarify the actual citation for the SIP requirements without changing any existing permit conditions. Thus, the revised permit includes the following sentence to permit conditions 3.3, 3.4, 3.6, and 3.9: "In accordance with the State Implementation Plan, 40 CFR 52.670(d) EPA-approved State Source-specific Requirements:"

Additionally, DEQ included a NAICS (North American Industry Classification System) on the cover

page and the General Provisions of this permit to reflect changes that have been made to DEQ's Tier II operating permit template. The NAICS code for this facility is 212321, *Construction Sand and Gravel Mining*.

Permit Conditions 2.14 (Obligation to Comply) and 3.12 (Certification of Documents) existing in Tier II Operating Permit No. T2-2008.0059 are deleted for this permit revision because they are duplicate to General Provisions 3 and 9, respectively.

The fuel-burning equipment and the references to residual fuel oil (i.e., ASTM Grades 4, 5, and 6 fuel oil) and to coal usage at the facility are also removed from the revised permit. It appears from Table 1.1 of the permit that the facility does not use fuel burning equipment or coal.

#### **4. PERMIT FEES**

No Tier II operating permit processing fees are required, in accordance with IDAPA 58.01.01.407.02.c.

#### **5. PUBLIC COMMENT**

Public comment is not required for this permit revision in accordance with IDAPA 58.01.01.404.04.

#### **6. EPA REVIEW OF THE PERMIT**

Because this permit is one of the permits in the Northern Ada County PM<sub>10</sub> Maintenance Plan (see attached Appendix B for the 40 CFR 52.670(d), Subpart N), DEQ provided the final Tier II operating permit to EPA, Region X.

## **Appendix A – AIRS Information**

## AIRS/AFS Facility-wide Classification Form

**Facility Name:** Clements Concrete Company  
**Facility Location:** Boise  
**Facility ID:** 001-00184 **Date:** 2/17/2009  
**Project/Permit No.:** T2-2008.0059 **Completed By:** Harbi Elshafei

Check if there are no changes to the facilitywide classification resulting from this action. (compare to form with last permit)

Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

	SO2	PM10	VOC	
Area Classification:	U	U	U	DO NOT LEAVE ANY BLANK

**Check one of the following:**

**SIP [ 0 ]** - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)

OR  
 **Title V [ V ]** - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:				B	B		

**PSD [ 6 ]** - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

**NSR - NAA [ 7 ]** - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

**NESHAP [ 8 ]** - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

**NSPS [ 9 ]** - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

**MACT [ M ]** - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

**Appendix B – 40 CFR 52.670(d), Subpart N**

As of the issuance date of this permit, the State Implementation requirements for this facility are now located at 40 CFR 52.670(d), EPA-approved State Source-specific Requirements, and they appear in the CFR exactly as follows:

Name of source	Permit number	State effective date	EPA approval date	Explanation
Mike's Sand and Gravel, Nampa, Idaho	001-00184	07/12/02	10/27/03, 68 FR 61106	The following conditions: 1.1, 1.3, 2.2.1, 3.1, and the Appendix. (Boise/Ada County Maintenance Plan)

Below is a copy of the Federal Register Notice that initially established these requirements.

**61110 Federal Register / Vol. 68, No. 207 / Monday, October 27, 2003 / Rules and Regulations**

**PART 52—[AMENDED]**

1. The authority citation for Part 52 continues to read as follows:

**Authority:** 42 U.S.C. 7401 et seq.

**Subpart N—Idaho**

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

**§ 52.670 Identification of plan.**

(c)

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

(i) Incorporation by reference.

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

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

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

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

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

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

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

**(7) State of Idaho Air Pollution Operating Permit for Nelson Construction Co., Permit No. T2-020029, issued July 21, 2003, the following conditions: 2 (heading only), .12, 2.14, 3 (heading only, 3.3, 3.4, 3.6, 3.7, 3.9, 3.10, 3.11, 3.12, 4 (heading only), 4.3, 4.4, 4.5, 4.6, 5, and Table 5.1.**

**(8) State of Idaho Air Pollution Operating Permit for Mike's Sand and Gravel, Permit No. 001-00184, issued July 12, 2002, the following conditions: 1.1, 1.3, 2.2.1, 3.1, and the Appendix.**