Statement of Basis

Permit to Construct No. P-2016.0007  
Project ID 62559

Interstate Concrete and Asphalt Sandpoint  
Sandpoint, Idaho

Facility ID 017-00048

Final

April 5, 2021  
Morrie Lewis  
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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APPENDIX A – PROCESSING FEE
ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

ASTM American Society for Testing and Materials
Btu British thermal units
CAA Clean Air Act
CBP concrete batch plant
CFR Code of Federal Regulations
CO carbon monoxide
cy cubic yards
DEQ Department of Environmental Quality
dscm dry standard cubic meter
dscf dry standard cubic feet
EPA U.S. Environmental Protection Agency
gr grains (1 lb = 7,000 grains)
HAP hazardous air pollutants
HMA hot mix asphalt
ICA Interstate Concrete and Asphalt Sandpoint
IDAPA a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr pounds per hour
MACT Maximum Achievable Control Technology
mg/dscm milligrams per dry standard cubic meter
MMBtu million British thermal units
NAAQS National Ambient Air Quality Standard
NESHAP National Emission Standards for Hazardous Air Pollutants
NO\textsubscript{x} nitrogen oxides
NSPS New Source Performance Standards
O&M operation and maintenance
O\textsubscript{2} oxygen
Pb lead
PM particulate matter
PM\textsubscript{2.5} particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM\textsubscript{10} particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD Prevention of Significant Deterioration
PTC permit to construct
PTE potential to emit
RAP recycled asphalt pavement
RFO reprocessed fuel oil
Rules Rules for the Control of Air Pollution in Idaho
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\textsubscript{2} sulfur dioxide
T/day tons per calendar day
T/hr tons per hour
T/yr tons per consecutive 12 calendar month period
T2 Tier II operating permit
TAP toxic air pollutants
VOC volatile organic compounds
yd yards
FACILITY INFORMATION

Description

Interstate Concrete and Asphalt Company (Interstate) operates a hot mix asphalt (HMA) plant, a concrete batch plant (CBP), and associated aggregate handling at the facility located at 1000 Baldy Mountain Road in Sandpoint, Idaho. Detailed process descriptions can be found in the permit.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Permit Number</th>
<th>Issue Date</th>
<th>Expiration Date</th>
<th>Project</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>T2</td>
<td>017-00048</td>
<td>7/7/1995</td>
<td>7/7/2000</td>
<td>Initial T2 for RACT/RACM implementation of attainment date extension project.</td>
<td>S</td>
</tr>
<tr>
<td>T2</td>
<td>017-00048</td>
<td>6/21/1996</td>
<td>7/7/2000</td>
<td>T2 modification of control equipment specifications.</td>
<td>S</td>
</tr>
<tr>
<td>T2</td>
<td>T2-990001</td>
<td>8/2/1999</td>
<td>8/2/2004</td>
<td>T2 modification to add two mini-baghouses to two cement silos.</td>
<td>S</td>
</tr>
<tr>
<td>PTC/T2</td>
<td>P-060113</td>
<td>6/14/2006</td>
<td>6/28/2010</td>
<td>PTC modification to allow an increase in hourly HMA production from 200 ton/hr to 300 ton/hr and an operation change from a batch dryer to a drum dryer.</td>
<td>S</td>
</tr>
<tr>
<td>PTC/T2</td>
<td>T2-2010.0069</td>
<td>3/18/2011</td>
<td>3/18/2016</td>
<td>T2 renewal with no changes in operations.</td>
<td>S</td>
</tr>
<tr>
<td>PTC</td>
<td>T2-2016.0007</td>
<td>7/28/2016</td>
<td></td>
<td>Conversion of T2 to PTC at the request of the applicant.</td>
<td>A, but will become S upon issuance of this permit</td>
</tr>
</tbody>
</table>

Application Scope

This PTC is a revision of an existing PTC. The applicant has proposed replacement of baghouse control equipment, the Drum Dryer Baghouse.

Application Chronology

January 8, 2021    DEQ received an application and an application fee.
February 12, 2021  DEQ determined that the application was complete.
March 16, 2021     DEQ made available the draft permit and statement of basis for peer and regional office review.
March 19, 2021     DEQ made available the draft permit and statement of basis for applicant review.
March 23, 2021     DEQ received the permit processing fee.
April 5, 2021      DEQ issued the final permit and statement of basis.
TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

<table>
<thead>
<tr>
<th>Sources</th>
<th>Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Drum Dryer</strong></td>
<td><strong>Drum Dryer Baghouse</strong></td>
</tr>
<tr>
<td>Manufacturer: Aesco Madsen</td>
<td>Manufacturer: Gencor</td>
</tr>
<tr>
<td>Model: CFM250</td>
<td>Model: CFS-116 or equivalent</td>
</tr>
<tr>
<td>Heat input rating: 75.6 MMBtu/hr</td>
<td>NSPS standard: 0.04 gr/dscf</td>
</tr>
<tr>
<td>Maximum production: 300 tons/hr</td>
<td></td>
</tr>
<tr>
<td>Allowable dryer fuels: natural gas, propane,</td>
<td></td>
</tr>
<tr>
<td>ASTM Grade 1 fuel oil, ASTM Grade 2 distillate fuel oil, and used oil</td>
<td></td>
</tr>
<tr>
<td><strong>Asphalt Storage Tank Heater</strong></td>
<td>None</td>
</tr>
<tr>
<td>Rated heat input capacity: 2.2 MMBtu/hr</td>
<td></td>
</tr>
<tr>
<td>Fuel type: natural gas</td>
<td></td>
</tr>
<tr>
<td><strong>Concrete Batch Plant</strong></td>
<td></td>
</tr>
<tr>
<td>Manufacturer: SPOMAC</td>
<td></td>
</tr>
<tr>
<td>Model: NA</td>
<td></td>
</tr>
<tr>
<td>Maximum production: 75 cy/hr</td>
<td></td>
</tr>
<tr>
<td><strong>Cement Storage Silo No.1 Baghouse No.1</strong></td>
<td></td>
</tr>
<tr>
<td>Manufacturer: Besser Appco</td>
<td></td>
</tr>
<tr>
<td>Model: DSC-250</td>
<td></td>
</tr>
<tr>
<td>Efficiency: 99.9%</td>
<td></td>
</tr>
<tr>
<td><strong>Cement Storage Silo No.2 Baghouse No. 2</strong></td>
<td></td>
</tr>
<tr>
<td>Manufacturer: Besser Appco</td>
<td></td>
</tr>
<tr>
<td>Model: DSC-260</td>
<td></td>
</tr>
<tr>
<td>Efficiency: 99.9%</td>
<td></td>
</tr>
<tr>
<td><strong>Fugitive Dust Sources</strong></td>
<td>Reasonable control (Permit Condition 2.1)</td>
</tr>
<tr>
<td>Vehicle fugitive dust (paved and unpaved roadways)</td>
<td>Engineered drop point enclosures</td>
</tr>
<tr>
<td>Process fugitive dust</td>
<td>ESCDS dust control</td>
</tr>
<tr>
<td></td>
<td>Fugitive Dust Control Plan, May 2, 1995</td>
</tr>
<tr>
<td></td>
<td>Paved road sweep and water spray</td>
</tr>
</tbody>
</table>

Emissions Inventories

This permitting action and project was not determined to be a modification as defined in IDAPA 58.01.01.006, because it does not result in:

- an emissions increase,
- the emission of any regulated air pollutant not previously emitted,
- an increase in the emissions rate of any state-only toxic air pollutant (TAP), or
- the emissions of any state-only TAP not previously emitted.

With the exception of the replacement baghouse manufacturer and model information, all emissions estimates and specifications on emissions units and control equipment remain the same as prior permitting actions T2-2016.0007 Project 61676 and T2-2010.0069 Project 0001. Refer to the Permitting History section for additional discussion.
**Ambient Air Quality Impact Analyses**

Modeling analysis was not required because there was no modification, as described in the Emissions Inventories section.

**REGULATORY ANALYSIS**

**Attainment Designation (40 CFR 81.313)**

The facility is located in Bonner County and in the Sandpoint PM$_{10}$ maintenance area and is subject to PM$_{10}$ Maintenance Plan. The county is designated as an attainment or unclassifiable area for carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO$_2$), ozone, particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (PM$_{2.5}$), and sulfur oxides (SO$_x$). Outside of the boundary of the Sandpoint PM$_{10}$ maintenance area, the county is unclassifiable for PM$_{10}$. Refer to the Idaho SIP - Sandpoint, Idaho, PM$_{10}$ Maintenance Plan section and to 40 CFR 81.313 for additional information.

**Facility Classification**

The AIRS/AFS facility classification codes are as follows:

For THAPs (Total Hazardous Air Pollutants) Only:

- **A** = Use when any one HAP has actual or potential emissions $\geq 10$ T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions $\geq 25$ T/yr.

- **SM80** = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits $\geq 8$ T/yr of a single HAP or $\geq 20$ T/yr of THAP.

- **SM** = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to $< 8$ T/yr of a single HAP and/or $< 20$ T/yr of THAP.

- **B** = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold

- **UNK** = Class is unknown.

For All Other Pollutants:

- **A** = Actual or potential emissions of a pollutant are $\geq 100$ T/yr.

- **SM80** = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are $\geq 80$ T/yr.

- **SM** = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are $< 80$ T/yr.

- **B** = Actual and potential emissions are $< 100$ T/yr without permit restrictions.

- **UNK** = Class is unknown.
Table 3  REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Uncontrolled PTE (T/yr)</th>
<th>Permitted PTE (T/yr)</th>
<th>Major Source Thresholds (T/yr)</th>
<th>AIRS/AFS Classification</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>&gt;100</td>
<td>&lt;100</td>
<td>100</td>
<td>SM</td>
</tr>
<tr>
<td>PM_{10}/PM_{2.5}</td>
<td>&gt;100 \text{ or } &gt;100</td>
<td>&lt;100</td>
<td>100</td>
<td>SM</td>
</tr>
<tr>
<td>SO₂</td>
<td>&lt;100</td>
<td>&lt;100</td>
<td>100</td>
<td>B</td>
</tr>
<tr>
<td>NOₓ</td>
<td>&gt;100</td>
<td>&lt;100</td>
<td>100</td>
<td>SM</td>
</tr>
<tr>
<td>CO</td>
<td>&gt;100</td>
<td>&lt;100</td>
<td>100</td>
<td>SM</td>
</tr>
<tr>
<td>VOC</td>
<td>&lt;100</td>
<td>&lt;100</td>
<td>100</td>
<td>B</td>
</tr>
<tr>
<td>HAP (single)</td>
<td>&lt;10</td>
<td>&lt;10</td>
<td>10</td>
<td>B</td>
</tr>
<tr>
<td>HAP (Total)</td>
<td>&lt;25</td>
<td>&lt;25</td>
<td>25</td>
<td>B</td>
</tr>
</tbody>
</table>

1 Information taken from the Statement of Basis for PTC No. P-060121 issued on June 26, 2006.
2 Assume PM_{10}=PM_{2.5}=PM

The facility classification remains unchanged because there was no modification, as described in the Emissions Inventories section.

**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 replacement of baghouse control equipment. 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.

**Idaho SIP - Sandpoint, Idaho, PM_{10} Maintenance Plan**

The facility is subject to the Sandpoint PM_{10} Maintenance Plan, and applicable requirements were previously incorporated into the permit. These permit conditions are noted as “Sandpoint SIP” in this PTC. For each permit condition that contains requirements from the Sandpoint PM_{10} Maintenance Plan, “Sandpoint SIP” was retained in the bracket citation located directly under the permit condition and in the right-hand margin. Requirements from the Sandpoint PM_{10} Maintenance Plan for fugitive sources are also included in Section 5 of the permit.

Regarding the emissions and throughput limits in Table 3.2 and Permit Condition 3.10, although the drum dryer stack is subject to a PM_{10} emissions limit of 2.3 lb/hr in Sandpoint PM_{10} Maintenance Plan, the facility was previously permitted at a PM_{10} emissions limit of 7.22 lb/hr (P-060113).

**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 criteria pollutants or 10 tons per year for any one HAP or 25 tons per year for all HAP as described 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 remains subject to 40 CFR 60 Subpart I – Standards of Performance for Hot Mix Asphalt Facilities, and this permitting action does not alter the applicability status of existing affected sources at the facility. DEQ is delegated this Subpart.

NESHAP Applicability (40 CFR 61)

The proposed replacement of baghouse control equipment is not an affected source subject to NESHAP in 40 CFR 61, and this permitting action does not alter the applicability status of existing affected sources at the facility.

MACT/GACT Applicability (40 CFR 63)

The proposed replacement of baghouse control equipment is not an affected source subject to NESHAP in 40 CFR Part 63, and this permitting action does not alter the applicability status of existing affected sources at the facility.

Permit Conditions Review

This section describes only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action. For each permit condition that contains requirements from the Sandpoint PM_{10} Maintenance Plan, “Sandpoint SIP” was retained in the bracket citation located directly under the permit condition and in the right-hand margin. Requirements from the Sandpoint PM_{10} Maintenance Plan for fugitive sources are also included in Section 5 of the permit. Permit Conditions identified as “reserved” have also been retained to ensure that permit numbering references remain consistent with citations in the SIP.

Revised Permit Conditions 1.1–1.4 and 3.3.2

These permit conditions describe the purpose of this permitting action and the emission sources and the control equipment regulated by this permit. Permit Conditions 1.4 (Table 1.1) and 3.3.2 were revised to reflect the replacement baghouse manufacturer and model information.

PUBLIC REVIEW

Public Comment Period

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04.
APPENDIX A – PROCESSING FEE
APPENDIX A – 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: Interstate Concrete and Asphalt  
Address: 1000 Baldy Mountain Road  
City: Sandpoint  
State: ID  
Zip Code: 83864  
Facility Contact: Brian Dagon  
Title: Construction Manager  
AIRS No.: 017-00048

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Annual Emissions Increase (T/yr)</th>
<th>Annual Emissions Reduction (T/yr)</th>
<th>Annual Emissions Change (T/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{x}</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td>SO\textsubscript{2}</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td>CO</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td>PM10</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td>VOC</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td>Total:</td>
<td>0.0</td>
<td>0</td>
<td>0.0</td>
</tr>
</tbody>
</table>

Fee Due $1,000.00

Comments: