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.

TABLE OF CONTENTS

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_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O_2	oxygen
Pb	lead
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
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_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
U.S.C.	United States Code
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).

Permit Type	Permit Number	Issue Date	Expiration Date	Project	Status
T2	017-00048	7/7/1995	7/7/2000	Initial T2 for RACT/RACM implementation of attainment date extension project.	S
T2	017-00048	6/21/1996	7/7/2000	T2 modification of control equipment specifications.	S
T2	017-00048	4/29/1998	7/7/2000	T2 modification of permit language for fugitive dust control methods.	S
T2	T2-990001	8/2/1999	8/2/2004	T2 modification to add two mini-baghouses to two cement silos.	S
PTC/T2	T2-040102	6/28/2005	6/28/2010	T2 renewal and PTC modification to allow using used oil for the dryer.	S
PTC/T2	P-060113	6/14/2006	6/28/2010	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.	S
PTC/T2	P-060121	6/26/2006	6/28/2010	PTC revision to correct typographical errors in fugitive emissions limits.	S
PTC/T2	T2-2010.0069 Project 0001	3/18/2011	3/18/2016	T2 renewal with no changes in operations.	S
PTC	T2-2016.0007 Project 61676	7/28/2016	[redacted]	Conversion of T2 to PTC at the request of the applicant.	A, but will become S upon issuance of this permit

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

Sources	Control Equipment
Drum Dryer Manufacturer: Aesco Madsen Model: CFM250 Heat input rating: 75.6 MMBtu/hr Maximum production: 300 tons/hr Allowable dryer fuels: natural gas, propane, ASTM Grade 1 fuel oil, ASTM Grade 2 distillate fuel oil, and used oil	Drum Dryer Baghouse Manufacturer: Gencor Model: CFS-116 or equivalent NSPS standard: 0.04 gr/dscf
Asphalt Storage Tank Heater Rated heat input capacity: 2.2 MMBtu/hr Fuel type: natural gas	None
Concrete Batch Plant Manufacturer: SPOMAC Model: NA Maximum production: 75 cy/hr Cement Storage Silo No.1 Baghouse No.1 Manufacturer: Besser Appco Model: DSC-250 Efficiency: 99.9% Cement Storage Silo No.2 Baghouse No. 2 Manufacturer: Besser Appco Model: DSC-260 Efficiency: 99.9%	A concrete batch plant building houses aggregate and sand transferring to elevated storage, weigh hopper loading, and truck loadout Cement storage silo baghouses are process equipment
Fugitive Dust Sources Vehicle fugitive dust (paved and unpaved roadways) Process fugitive dust	Reasonable control (Permit Condition 2.1) Engineered drop point enclosures ESCDS dust control Fugitive Dust Control Plan, May 2, 1995 Paved road sweep and water spray

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[1]

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	>100	<100	**100**	SM
$PM_{10}/PM_{2.5}$	>100 [2]	<100	**100**	SM
SO_2	<100	<100	**100**	B
NO_x	>100	<100	**100**	SM
CO	>100	<100	**100**	SM
VOC	<100	<100	**100**	B
HAP (single)	<10	<10	**10**	B
HAP (Total)	<25	<25	**25**	B

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

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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**

N	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	0.0	0	0.0
SO_2	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
Total:	0.0	0	**0.0**
Fee Due	**$ 1,000.00**		

Comments: