STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

June 26, 2006

Certified Mail No. 7005 1160 0000 1550 4724

Corky Witherwax
Environmental Manager
Interstate Concrete and Asphalt Company
845 W. Kathleen St.
Coeur d'Alene, ID 83815

RE: Facility ID No. 017-00048, Interstate Concrete and Asphalt Company, Sandpoint
Final Tier II Operating Permit and Permit to Construct

Dear Mr. Witherwax:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit and Permit to Construct No. P-060121 to Interstate Concrete and Asphalt Company, in accordance with the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 - 228. This permit replaces Tier II Operating Permit and Permit to Construct No. P-060113, issued June 14, 2006, the terms and conditions of which shall no longer apply.

The enclosed permit is effective immediately. The permit includes an additional permit condition (Permit Condition 2.17) requested by the Regional Office to clarify that compliance with Air Pollution Emergency rules is required, and corrects typographical errors for the fugitive emissions limits. Modification to and/or renewal of this permit shall be requested in a timely manner in accordance with the Rules for the Control of Air Pollution in Idaho.

In accordance with IDAPA 58.01.01.224.02 and 225, no PTC application fee or PTC processing fee is required. A representative of the Coeur d'Alene Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. In addition to your facility's plant manager, DEQ recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, DEQ encourages you to contact Bill Rogers at (208) 373-0502 or william.rogers@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/BR/CR/bf Permit No. P-060121
Enclosure

c: Dan Redline, Coeur d'Alene Regional Office
Bill Rogers, AQ Division/Permit Coordinator
Cheryl Robinson, AQ Division/Permit Writer
Joan Lechtenberg, AQ Division/Public Comment
Marilyn Seymore/ Pat Rayne, Air Quality Division
Laurie Kral, EPA Region 10
Source File
Permit Binder
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)

Air Quality **TIER II OPERATING PERMIT** **and** **PERMIT TO CONSTRUCT** **State of Idaho** **Department of Environmental Quality**	**PERMIT No.:** P-060121 **FACILITY ID No.:** 017-00048 **AQCR:** 63 **CLASS:** SM **SIC:** 3273**ZONE:** 11 **UTM COORDINATE (km):** 532.361, 5348.2

1. PERMITTEE Interstate Concrete and Asphalt Company			
2. PROJECT Tier II Operating Permit and Permit to Construct Modification			
3. MAILING ADDRESS 845 W. Kathleen St.	**CITY** Coeur d'Alene	**STATE** ID	**ZIP** 83815
4. FACILITY CONTACT Corky Witherwax	**TITLE** Environmental Manager	**TELEPHONE** (208) 765-1144	
5. RESPONSIBLE OFFICIAL C. Patrick McFarlane	**TITLE** President	**TELEPHONE** (208) 765-1144	
6. EXACT PLANT LOCATION 1000 Baldy Mountain Road Sandpoint, Idaho		**COUNTY** Bonner	
7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS Asphalt plant, aggregate handling, and batch concrete plant			

8. PERMIT AUTHORITY

This Tier II Operating Permit and Permit to Construct is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400-410 and IDAPA 58.01.01.200-228, respectively, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

The Permit to Construct conditions are not subject to the expiration of this permit. The remaining terms and conditions are Tier II Operating Permit conditions and are subject to the expiration of this permit.

The Permit to Construct conditions in this permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with Section 58.01.01.200 of the Rules for the Control of Air Pollution in Idaho.

JM Sandoval

TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:	June 28, 2005
DATE MODIFIED/REVISED:	June 26, 2006
DATE EXPIRES:	June 28, 2010

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Acronyms, Units, and Chemical Nomenclatures

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu/hr	British thermal unit per hour
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
°F	degrees Fahrenheit
gr/dscf	grains (1 lb = 7,000 grains) per dry standard cubic foot
HMA	hot mix asphalt
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu/hr	million British thermal units per hour
NO_X	nitrogen oxides
NSPS	New Source Performance Standards
PCBs	polychlorinated biphenyls
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
O&M	operation and maintenance manual
RAP	recycled asphalt pavement
SIC	Standard Industrial Classification
SM	synthetic minor
T/yr	tons per year
UTM	Universal Transverse Mercator
ZONE	UTM zone

1. PERMIT SCOPE

Purpose

1.1 This modification to the Tier II operating permit and permit to construct affects only the hot-mix asphalt plant to 1) include an additional permit condition (Permit Condition 2.17) requested by the Regional Office to clarify that compliance with Air Pollution Emergency rules is required, and 2) corrects typographical errors in the fugitive emissions limits. A Tier II Operating Permit (No. 017-00048, issued August 2, 1999) was required for the development of the Sandpoint Area PM_{10} Attainment Plan.

1.2 Tier II Operating Permit and Permit to Construct No P-060121 replaces Tier II Operating Permit and Permit to Construct P-060113, issued on June 14, 2006, the terms and conditions of which shall no longer apply.

Regulated Sources

1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section(s)	Source Description	Emissions Control(s)
3	Drum Dryer Manufacturer: Aesco/Madsen CFM250 Rated heat capacity: 75.6 MMBtu/hr Production capacity: 300 tons/hr Allowable dryer fuels: natural gas, propane, distillate fuel oil, and used oil	Baghouse Manufacturer: AESCO Model 420 Mfr Guarantee: 0.04 gr/dscf
4	Concrete Batch Plant Includes two cement silo bin vents	Cement silo mini baghouse For Silo No. 1 Manufacturer: Besser Appco DSC-250 Efficiency: 99.9% Cement silo mini baghouse For Silo No. 2 Manufacturer: Besser Appco DSC-260 Efficiency: 99.9%
3, 4, & 5	Fugitive Dust Sources Vehicle fugitive dust (paved and unpaved roadways) Process fugitive dust	Reasonable control (Permit Condition 2.1) Engineered drop point enclosures Baghouses ESCDS dust control Fugitive Dust Control Plan, May 2, 1995 Paved road sweep and water spray

2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

2.10 The permittee shall comply with IDAPA 58.01.01.600-617, Rules for Control of Open Burning.

Monitoring and Recordkeeping

2.11 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a

period of at least five years from the date of the monitoring sample, measurement, report, or application, beginning two years prior to June 28, 2005 (the initial issuance date of Tier II Operating Permit and Permit to Construct No. T2-040102). Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

Reports and Certifications

2.12 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit, with the exception of a Portable Equipment Registration and Relocation form, shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422 Fax: (208) 769-1404

Obligation to Comply

2.13 Receiving this permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

Fuel-burning Equipment

2.14 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel.

Sulfur Content

2.15 The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight
- ASTM Grade 2 fuel oil - 0.5% by weight

2.16 The permittee shall demonstrate compliance with the fuel oil sulfur content limits by obtaining documentation of the sulfur content analysis for each shipment of fuel oil on an as-received basis. Records of each fuel oil sulfur content analysis shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

Air Pollution Emergency Rules

2.17 The permittee shall comply with the requirements of IDAPA 58.01.01.550-562.

3. HOT MIX ASPHALT PLANT

3.1 Process Description

Haul trucks bring crushed aggregate and sand on site where it is dumped into storage piles. A front-end loader transfers aggregate and sand, as needed, to a five-bin cold feed hopper. The aggregate may consist of up to 50% recycled asphalt pavement (RAP). Metered quantities of aggregate are fed from the hopper bins onto slow-moving feeder conveyors, sorted by a scalping screen for proportioned size gradations, and then delivered into a rotating drum dryer. A burner located at one end of the drum dryer dries and heats the aggregate to approximately 300°F. The aggregate travels through the rotating drum counter current to the heating media. The heated and dried aggregate is then mixed with liquid asphalt cement. The resulting hot mix asphalt (HMA) is then conveyed to hot storage silos until it can be loaded into trucks for transport off site. A collection system at the top of the hot mix storage silos collects particulates and gases and routes them back to the drum dryer.

The allowable fuel types that can be combusted in the drum dryer burner are natural gas, propane, distillate fuel oil and used oil. Particulate matter emissions from the burner are the same for all fuel types.

Asphalt oil is delivered to the facility by bulk tankers. The tankers transport the asphalt oil to one of the storage tanks. The asphalt plant also loads raw aggregate into haul trucks from a front-end loader.

The emission limits specified in this permit apply when any of the allowable fuel types are used.

3.2 Emission Control Description

Particulate matter (PM) emissions from the drum dryer and from silo filling are controlled by a baghouse. PM emissions from HMA loadout are limited by a partial enclosure. Reclaimed baghouse dust is combined with dried aggregate in the bucket conveyor.

Table 3.1 HOT MIX ASPHALT PLANT DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device
Drum dryer, HMA silo filling	Baghouse
HMA Loadout	Partial enclosure (65% capture)

3.3 Equipment Specifications

3.3.1 Aesco/Madsen CFM250 Drum Dryer.

- Rated heat input capacity is 75.6MMBtu/hr
- Allowable drum dryer burner fuel types: natural gas, propane, ASTM Grade 1 fuel oil, ASTM Grade 2 fuel oil, and used oil meeting the specification contained in Permit Condition 3.9.

- Hot-mix asphalt production is limited to 300 T/hr, and is allowed upon the continued use and maintenance of all Conditional Control Measures contained in Permit Condition 3.2; the continued successful demonstration of compliance with the PM standard of performance specified in 40 CFR 60.92 (0.04 gr/dscf and stack opacity not to exceed 20%); and the continued successful demonstration of compliance with the PM and PM_{10} emissions rate limits listed in Table 3.2 and Appendix A.

3.3.2 AESCO Model ASB-420 Baghouse

- Baghouse Design Performance:

  Manufacturer guarantee, maximum grain loading of 0.04 gr/dscf.

- Stack parameters:

  Stack height is 60 feet (18.3 meters).
  Exit diameter is 3.15 feet (0.96 meters).

Emissions Limits

3.4 Emission Limits

3.4.1 Drum Dryer Stack

- In accordance with 40 CFR 60.92, PM emissions from the drum dryer stack shall not exceed 0.04 gr/dscf.
- PM emissions from the drum dryer stack shall not exceed any corresponding emissions rate limit listed in Table 3.2 and Appendix A.
- PM_{10} emissions from the drum dryer stack shall not exceed any corresponding emissions rate limit listed in Table 3.2 and Appendix A.
- In accordance with 40 CFR 60.92, visible emissions from the drum dryer stack shall not exceed 20% opacity. Opacity shall be determined using the test methods and procedures contained in 40 CFR 60.93(b)(2) and IDAPA 58.01.01.625.04.
- In accordance with IDAPA 58.01.01.625, visible emissions from the drum dryer stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period. Opacity shall be determined using the test methods and procedures contained in IDAPA 58.01.01.625.04.

3.4.2 Vehicle Fugitive Dust and Process Fugitive Dust

- Fugitive PM_{10} emissions from the vehicle traffic on paved and unpaved roads and from processes associated with the hot-mix asphalt plant shall not exceed any corresponding emissions rate limit listed in Table 3.2 and Appendix A.

Table 3.2 ASPHALT PLANT EMISSIONS LIMITS

Source Description	PM[a]		PM_{10}[a]	
	lb/hr	T/yr	lb/hr	T/yr
Drum dryer stack (all fuel types)	9.0	2.09	6.28	1.46
Vehicle fugitive dust (Paved and unpaved)	---	---	0.072	0.017
Process fugitive dust	---	---	0.12	0.045

[a] Includes condensibles

Operating Requirements

3.5 Allowable Drum Dryer Burner Fuel

The fuel supplied to the drum dryer burner shall be natural gas, liquefied petroleum gas (propane), ASTM Grade 1 fuel oil, ASTM Grade 2 fuel oil, or used oil.

[PTC Condition]

3.6 ASTM Grade 1 Fuel Oil Sulfur Content Limit

The permittee shall not use any ASTM Grade 1 fuel oil in the drum dryer burner having a sulfur content greater than 0.3% by weight.

[PTC Condition]

3.7 ASTM Grade 2 Fuel Oil Sulfur Content Limit

The permittee shall not use any ASTM Grade 2 fuel oil in the drum dryer burner having a sulfur content greater than 0.5% by weight.

[PTC Condition]

3.8 Used Oil Fuel Sulfur Content Limit

The permittee shall not use any used oil in the drum dryer burner having a sulfur content greater than 0.5% by weight.

[PTC Condition]

3.9 Used Oil Specifications

In accordance with 40 CFR 279.11, with the exception of total halogens which are limited to 1,000 ppm, used oil burned for energy recovery shall not exceed any of the allowable levels of the constituents and properties listed in Table 3.3. In addition, used oil shall not contain a quantifiable level (2 ppm) of polychlorinated biphenyls (PCBs).

Table 3.3 USED OIL SPECIFICATIONS[1]

Constituent/property	Allowable level
Arsenic	5 ppm[2] maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Flash point	100 deg. F minimum
Total halogens	1,000 ppm maximum
PCBs[3]	< 2 ppm

[1] The specification does not apply to mixtures of used oil and hazardous waste that continue to be regulated as hazardous waste (see 40 CFR 279.10(b)).
[2] Parts per million
[3] Applicable standards for burning of used oil containing PCBs are imposed by 40 CFR 761.20(e)

[PTC Condition]

3.10 Hot-Mix Asphalt Production Limits

- Hot-mix asphalt production shall not exceed 300 tons per hour.
- Hot-mix asphalt production shall not exceed 3,600 tons per day.
- Tons per day of RAP fed as part of the design aggregate shall not exceed 50 percent of the total HMA production in tons per day, or 1,800 tons per day, whichever is less.
- Hot-mix asphalt production shall not exceed 140,000 tons per any consecutive 12-month period.

[PTC Condition]

3.11 Air Pollution Control Equipment

The baghouse shall be operated at all times during the operation of the drum dryer.

[PTC Condition]

3.12 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure differential across the baghouse.

[PTC Condition]

3.13 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an operations and maintenance (O&M) manual for the baghouse. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the baghouse operating requirements contained in this permit. The manual shall remain on site at all times and shall be available to DEQ representatives upon request.

[PTC Condition]

3.14 Pressure Drop Across Air Pollution Control Device

The pressure drop across the baghouse shall be maintained within the manufacturer's and O&M manual's specifications. Documentation of both the manufacturer's and O&M manual's operating pressure drop specifications shall remain on site at all times and shall be available to DEQ representatives upon request.

[PTC Condition]

Monitoring and Recordkeeping Requirements

3.15 Operating Parameters Monitoring

The permittee shall monitor and record the following information. Beginning two years prior to June 28, 2005 (the initial issuance date of Tier II Operating Permit and Permit to Construct No. T2-040102), records of this information shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

- Hot-mix asphalt production to demonstrate compliance with Permit Condition 3.10. Annual production shall be determined by summing daily production monthly, and summing monthly production over the previous consecutive 12-month period.

[PTC Condition]

- The pressure drop across the drum dryer baghouse once per day when the hot-mix asphalt plant is operating to demonstrate compliance with Permit Condition 3.14.

[PTC Condition]

3.16 Performance Tests

3.16.1 Within 60 days after achieving the maximum production rate at which the affected facility will operate but not later than 180 days after initial start up of the source, a performance test shall be conducted on the hot-mix asphalt drum dryer under worst-case normal operating conditions in accordance with IDAPA 58.01.01.157, General Provision 6 of this permit, and in accordance with 40 CFR 60.90. The performance test shall be conducted to demonstrate compliance with the applicable PM standards defined in 40 CFR 60.92 and the pound per hour PM emission limit of Permit Condition 3.4 of this permit. The following shall be monitored and recorded during the performance tests:

- The hourly production rate of the hot-mix asphalt plant expressed as tons per hour,
- The pressure drop across the baghouse,
- The visible emissions observed during the performance tests, and
- Operating variables used to demonstrate worst-case normal operating conditions.

3.16.2 The permittee shall conduct performance tests at a frequency of no less than once every year to demonstrate compliance with the PM standards of performance as required by 40 CFR 60.92 and the hourly PM and PM10 emissions rate limits listed in Table 3.2 and Appendix A. The permittee may show compliance with the hourly drum dryer stack PM_{10} emission limit by conducting a performance test using EPA Reference Methods 5 and 202. The resulting pound per hour (lb/hr) emission rate measured during the performance test shall be multiplied by a factor of 0.40 to establish the hourly

PM_{10} emission rate. The permittee shall have the option of conducting a Method 201 or 201A performance test with a Method 202 performance test. Visible emissions shall be observed during this test using the methods in IDAPA 58.01.01.625.

3.17 Used Oil Fuel Certification

The permittee shall demonstrate compliance with the used oil fuel specifications in Permit Condition 3.9 by obtaining a used oil fuel certification from the used oil fuel supplier on an as-received basis. The certification shall include the following information:

- The name and address of the used oil supplier.
- The measured concentration, expressed as ppm, of each constituent listed in Table 3.3.
- The flash point of the used oil expressed as degrees Fahrenheit.
- The analytical method or methods used to determine the concentration of each constituent and property (flash point) listed in Table 3.3.
- The date and location of each sample.
- The date of each certification analysis.

Records of each certification shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[PTC Condition]

3.18 Fuel Oil Sulfur Content Limits Monitoring

The permittee shall demonstrate compliance with the fuel oil sulfur content limits specified in Permit Conditions 3.6, 3.7, and 3.8 by obtaining documentation of the sulfur content analysis for each shipment of fuel oil (ASTM Grade 1 fuel oil, ASTM Grade 2 fuel oil, and used oil) on an as-received basis. Records of each fuel oil sulfur content analysis shall remain onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.

[PTC Condition]

Reporting Requirements

3.19 Relocation of Portable Source

At least 10 days prior to the relocation of any portable equipment covered by this permit, the permittee shall report to DEQ, on relocation forms supplied by DEQ, information pertaining to:

- When start-up will occur, and how long operations will last.
- Location of new operations.
- All equipment to be used at the new location.

3.20 Conditional Control Measure Reporting

The permittee shall provide notice to the DEQ within 10 days of making any changes to the engineering enclosures listed in Permit Condition 3.2.

3.21 Performance Test Protocol

The permittee shall submit a test protocol for the performance tests required in Permit Condition 3.16 to DEQ for approval at least 30 days prior to conducting the test.

[PTC Condition]

3.22 Performance Test Report

The permittee shall submit a report of the results of the performance tests required in Permit Condition 3.16, including all required process data, to DEQ within 30 days after concluding the test.

[PTC Condition]

4. CONCRETE BATCH PLANT

4.1 Process Description

Equipment at the concrete batch plant includes the batch unit with cement and aggregate weigh hoppers and load-out conveyor belt, three cement silos (one of which is equipped with a weigh hopper), and elevated aggregate storage bins with charging hopper and conveyor.

Washed rock and sand are derived from off-site source(s) and are transported onto the facility by haul trucks. The sand and aggregate are dumped in the storage pile area shared by the asphalt batch plant. A front-end loader then transfers the aggregate to the charging hopper as needed. From the charging hopper, the aggregate is transported at a rate of 200 T/hr by a conveyor to the elevated storage bins. The aggregate travels along a conveyor to a weigh hopper where it is transferred directly to a mixer truck in the desired proportions. Raw cement is batched in either of two locations: in the first case, it is discharged directly onto the aggregate conveyor, and in the second case, it is transferred directly to the mixer truck. Water is added at the common aggregate/cement entry point simultaneously. Aggregate and approximately two-thirds of the water are added to the mixer prior to introduction of cement. The last portion of water is added after all other ingredients have been mixed. The mixer truck blends the mixture and transports the concrete off-site.

Cement is delivered by bulk tanker truck, which pneumatically conveys the cement to one of two storage silos.

The concrete batch plant provides aggregate for delivery off-site. A front-end loader either transfers the aggregate directly to the haul trucks or to the pea gravel hopper (PG Hopper), which in turn drops the aggregate into haul trucks.

4.2 Emission Control Description

4.2.1 Cement Storage Silos

Particulate emissions from the two cement silo bin vents are controlled by two dedicated mini baghouses. Bags are cleaned by motor driven shaker. Baghouse cement dust reclaimed by the shaker is returned to the storage bin.

4.2.2 Conveyors

The following material drop points for the concrete batch plant operation are equipped with a partial enclosure: Charging hopper to conveyor (aggregate) and elevated silo to weigh hopper (aggregate).

The following material drop point for the concrete batch plant operation is equipped with no enclosure: conveyor to silo.

4.2.2.1 Enclosing of Drop Points for Conditional Control Measures

Engineered enclosures shall be around the three material drop points in the concrete batch plant's configuration. The pea gravel hopper (PG Hopper) loadout operation shall be controlled by an engineered enclosure.

4.2.2.2 Operation of Scavenge Air and Baghouse System for Mixer Truck Loading Conditional Control Measures

The permittee shall operate an effective scavenge air and baghouse emission control system to control fugitive emissions from the transfer of aggregate and cement from the weigh hopper to the mixer truck.

Table 4.1 CONCRETE BATCH PLANT DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device
Cement storage silos	Two mini-baghouses
Charging hopper to conveyor Elevated silo to weigh hopper	Partial enclosures
Three material drop points Pea gravel hopper loadout	Engineered enclosures

4.3 Equipment Specifications

4.3.1 Cement Silo Baghouses

- Silo No. 1 is approximately 20 meters high and is served by a Besser Appco DSC-250 Dust Collector (Minibaghouse). The Baghouse is equipped with 42 bags; each bag is four inches in diameter and 36 inches long. The vent diameter is 0.25 meters.
- Silo No. 2 is approximately 13 meters high and is served by a Besser Appco DSC-260 Dust Collector (Minibaghouse). The baghouse is equipped with 42 bags; each bag is 4 1/2 inches in diameter and 67 inches long. The vent diameter is 0.25 meters.
- Performance design characteristics: 99.9% efficiency for Portland Cement emission control for both baghouses.
- Stack parameters: Elevation of Silo No.2 vent is approximately 20 meters high. Elevation of Silo No. 3 vent is approximately 10 meters high. Vent diameter of both silo vents is 0.25 meters.

4.3.2 Overhead Bins

- Manufacturer: SPOMAC
- Design Capacity: Overhead (elevated) bins have a storage capacity of 280 tons.
- Process-limiting capacity: Conveyor that feeds the overhead bins limits production rate to 200 tons per hour aggregate.

Emission Limits

4.4 Emission Limits

4.4.1 Cement Silo Baghouses

- PM_{10} emissions from the cement silo baghouses shall not exceed any corresponding emissions rate limits listed in Table 4.2 or Appendix A.

- Visible emissions from the cement silo baghouse stacks shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60 minute period as required by IDAPA 58.01.01.625.

4.4.2 Vehicle Fugitive Dust and Process Fugitive Dust

- Fugitive PM_{10} emissions from the vehicle traffic on paved and unpaved roads and from processes associated with the hot-mix asphalt plant shall not exceed any corresponding emissions rate limit listed in Table 4.2 and Appendix A.

Table 4.2 CONCRETE BATCH PLANT EMISSIONS LIMITS

Source Description	PM[a]		PM_{10}[a]	
	lb/hr	T/yr	lb/hr	T/yr
Cement silo baghouses	0.08	0.04	0.08	0.04
Vehicle fugitive dust (Paved and unpaved roads)	3.32	1.45	0.89	0.34
Process fugitive dust	3.07	2.51	0.63	1.1

[a]Includes condensibles

Operating Requirements

4.5 Concrete Production Rate Limits

- Concrete production shall not exceed 75 cubic yards per hour.
- Concrete production shall not exceed 1,400 cubic yards per day.
- Concrete production shall not exceed 70,000 cubic yards per any consecutive 12-month period.

4.6 Retail Aggregate Sales Limit

- Retail aggregate sales shall not exceed 1,700 tons per day.
- Retail aggregate sales shall not exceed 55,000 tons per any consecutive 12-month period.

Monitoring and Recordkeeping Requirements

4.7 Concrete Production and Retail Aggregate Sales Records

The permittee shall monitor and record the following information weekly. Beginning two years prior to June 28, 2005 (the initial issuance date of Tier II Operating Permit and Permit to Construct No. T2-040102), records of this information shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

- Concrete production to demonstrate compliance with Permit Condition 4.5.
- Retail aggregate sales to demonstrate compliance with Permit Condition 4.6.

5. SPECIFIC REQUIREMENTS FOR FUGITIVE EMISSION SOURCES REQUIRED BY THE SANDPOINT SIP

5.1 Process Description

This section of the permit includes fugitive emission sources. Sources of fugitive emissions include vehicle traffic on paved and unpaved roads, aggregate handling, and stockpile erosion. Various sized aggregates are delivered by truck to the stockpile area. Conveyors deliver sized aggregate to three overhead bins at the top of the concrete plant. Related to asphalt production, a front-end loader transfers aggregate as needed to a four-bin cold feed hopper. Metered quantities of aggregate are fed from the hopper onto two open conveyors in series and delivered to a natural gas-fired drum dryer. Stockpiled sand and gravel are then loaded out into vehicles of various configuration either from the PG Hopper or a front-end loader. Several of these sources have been discussed in previous sections.

Emissions Limits

5.2 Fugitive Emissions

At all times, fugitive emissions shall be reasonably controlled by the following methods, but not limited to the following methods, as required in IDAPA 58.01.01.650 and 808.

5.2.1 All unpaved haul roads and front-end loader travel areas shall be treated with an environmentally safe chemical dust suppressant (ESCDS) as needed. The ESCDS shall be applied in sufficient quantities and frequency so as to provide reasonable control of fugitive dust from the unpaved haul roads and front-end loader travel areas. Water shall be applied to the unpaved traffic areas following the ESCDS applications in the amounts and frequency necessary to control fugitive dust emissions.

5.2.2 Vehicle Traffic Emissions Control for Conditional Control Measures

The permittee shall maintain fugitive PM_{10} control strategies according to the methods submitted to DEQ in the following document: "Fugitive Dust Control Plan", Interstate Concrete & Asphalt Company, Sandpoint, Idaho, June 25, 1998.

Operating Requirements

5.3 Conditional Control Measures for Vehicle Traffic

The permittee shall maintain the control measures on unpaved roads and areas and sweep (water flushing as necessary) all paved roads at least weekly.

The permittee shall maintain the pavement on the access roads and scale area.

Monitoring and Recordkeeping Requirements

5.4 Monitoring Requirements

5.4.1 Chemical Dust Suppressant Application Plan

5.4.1.1 The permittee shall develop and keep current a Chemical Dust Suppressant Application Plan (CDSAP).

- Brand name and chemical composition of the ESCDS selected for use.
- Dilution ratio (volume of water: volume of ESCDS) to be used in the formation of each ESCDS solution ready for direct application.
- Application intensity, in gallons per square yard (gal/yd^2), of the ESCDS solution for each projected treatment date.
- Facility plot plan illustrating the proposed treatment areas.

5.4.1.2 ESCDS Application Log

The permittee shall record the following information each time the ESCDS is applied:

- Brand name and chemical composition of the ESCDS used.
- Dilution ratio (volume of water: volume of ESCDS) used to form the ESCDS solution ready for direct application.
- Date of ESCDS solution application.
- Application intensity (gal/yd^2) of the ESCDS solution.
- Facility plot plan illustrating the treated areas.
- Name of the firm and of the operator responsible for the ESCDS solution application. The operator shall initial these required records to verify their accuracy.

5.4.1.3 Paved Road Control Measures Log

The permittee shall record in a log the following information:

- The date the paved traffic areas are swept (or broomed).
- The date the paved traffic areas are flushed with water.
- Name of the firm and of the operator responsible for the housekeeping activities listed in Permit Condition 5.4.1.2.

Reporting Requirements

5.5 Chemical Dust Suppressant Application Plan

5.5.1 A copy of the CDSAP shall be made available to DEQ representatives upon request.

5.5.2 The permittee shall notify the DEQ in writing of any changes in an existing CDSAP at least 30 days prior to the proposed date of change.

5.6 ESCDS Application Log

5.6.1 A copy of the ESCDS Application Log and Paved Road Control Log shall be maintained on-site for the most recent five year period beginning two years prior to June 28, 2005 (the initial issuance date of Tier II Operating Permit and Permit to Construct No. T2-040102).

5.6.2 Access to these records shall be made available to DEQ representatives upon request.

5.7 Notification

The permittee shall provide notice to the DEQ within 10 days of making any changes to the material drop point engineering enclosures listed in Permit Condition 4.2.

6. PERMIT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:

   - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
   - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.

4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:

   - A notification of the date of initiation of construction, within five working days after occurrence;
   - A notification of the date of completion/cessation of construction, within five working days after occurrence;
   - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
   - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
   - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

APPENDIX A

SUMMARY OF EMISSION RATE LIMITS

Interstate Concrete and Asphalt Co., Sandpoint
Emission Limits[a] – Hourly (lb/hr), and Annual[b] (T/yr)

Source Description	PM		PM_{10}[c]	
	lb/hr	T/yr	lb/hr	T/yr
ASPHALT PLANT				
Drum dryer stack	9.0	2.09	6.28	1.46
Vehicle fugitive dust (Paved and unpaved)	---	---	0.072	0.017
Process fugitive dust	---	---	0.12	0.045
CONCRETE PLANT				
Cement silo baghouses	0.08	0.04	0.08	0.04
Vehicle fugitive dust (Paved and unpaved)	3.32	1.45	0.89	0.34
Process fugitive dust	3.07	2.51	0.63[d]	1.1[d]

[a] As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

[b] As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

[c] Includes condensibles

[d] Includes point source emissions for the two minibaghouses placed on the cement weigh hoppers and the scavenge fan/baghouse system on the mixer loading operation installed as Conditional Control Measures.