



Air Quality Permitting Statement of Basis

July 26, 2004

Permit to Construct No. P-030123

Interstate Concrete and Asphalt Co., Coeur d'Alene

Facility ID No. 777-00068

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FINAL PERMIT

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
HAPs	hazardous air pollutants
hr/day	hours per day
hr/yr	hours per year
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM, PT	particulate matter
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
SO ₂	sulfur dioxide
T/hr	tons per hour
T/yr	tons per year
TAPs	toxic air pollutants
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, for issuing permits to construct (PTCs).

Interstate Concrete and Asphalt Company (Interstate) is proposing to replace an impact crusher with a cone crusher. Each has a rated throughput capacity of 300 T/hr. Regulated air pollutant emissions do not increase as a result of this proposed project.

2. FACILITY DESCRIPTION

Interstate produces graded aggregates through a rock-crushing process. The process includes primary crushing, secondary crushing, tertiary crushing if required, screening, transferring, and stockpiling. Emissions are controlled by water or chemical dust suppressants, and enclosures, if applicable. The rock-crushing facility does not include a fossil fuel-fired generator. The only regulated air pollutant emitted by this facility is PM.

3. FACILITY / AREA CLASSIFICATION

This rock-crushing facility is not a major facility as defined by IDAPA 58.01.01.205. The facility is not a designated facility as defined by IDAPA 58.01.01.006.27. The facility is subject to federal NSPS requirements in accordance with 40 CFR 60, Subpart OOO, but it is not subject to any federal NESHAP requirements in accordance with 40 CFR 61 or MACT requirements in accordance with 40 CFR 63. The SIC code defining the facility is 1442 and the AIRS/AFS facility classification is B. The AIRS information defining the classification for each regulated air pollutant at the facility is provided in Appendix A of this document.

This facility is portable. So long as the permittee complies with all of the provisions of PTC No. P-030123, the facility can operate anywhere within Idaho.

4. APPLICATION/PERMIT SCOPE

4.1 *Application/Permit Chronology*

July 14, 2003	DEQ received a PTC application from Interstate for a PTC revision.
January 13, 2004	DEQ issued an incompleteness letter to Interstate because application fees were not paid when the application was submitted.
January 28, 2004	DEQ received the application fee
February 26, 2004	DEQ issued a completeness letter
April 6, 2004	DEQ issued a draft to the facility for their review
April 13, 2004	The Coeur d'Alene Regional Office was provided an electronic copy of the final permit for review and comment. They had no comments.

5. PERMIT ANALYSIS

This section describes the regulatory requirements for this PTC action.

5.1 Emissions Inventory

Emissions are not increasing as a result of this proposed project. Interstate simply proposes to replace an impact crusher with a rated capacity of 300 T/hr with a cone crusher having the same capacity. Because emissions are not increasing, an emissions inventory was not conducted. Refer to the technical memorandum crafted for the January 23, 1995 PTC for the emissions inventory.

5.2 Modeling

Modeling was not required because emissions are not increasing.

5.3 Regulatory Review

This section discusses and documents DEQ's regulatory analysis of the proposed project with respect to applicable provisions of the *Rules for the Control of Air Pollution in Idaho*:

IDAPA 58.01.01.201 *Permit to Construct Required*

This facility is an existing nonmajor permitted facility. This permit revision changes the equipment listing to reflect the replacement of the impact crusher with a new cone crusher.

40 CFR 60 *New Source Performance Standards*

This facility is subject to the requirements contained in 40 CFR 60, Subpart OOO, which apply to nonmetallic mineral processing plant constructed, reconstructed, or modified after August 31, 1983. Review of the permit indicates the applicable parts of Subpart OOO are included in the permit as applicable requirements.

5.4 Fee Review

Interstate paid the \$1,000 application fee required by IDAPA 58.01.01.224 on January 28, 2004. In accordance with IDAPA 58.01.01.225, a PTC processing fee of \$500 is required because the permit crafted for this proposed project is a General Permit.

This facility is a natural minor facility; consequently, registration fees are not applicable in accordance with IDAPA 58.01.01.387.

6. PERMIT CONDITIONS

This section summarizes and explains the reasoning behind the monitoring and recordkeeping conditions in the PTC.

6.1 Portable Rock-crushing Plant Permit Conditions

Operating Parameters – Permit Condition 2.11

Permit Condition 2.11 requires that Interstate monitor and record various operating parameters to demonstrate compliance with the terms and conditions of their permit. The following list is the list of parameters the permittee is required to monitor and record on a daily basis. The bolded text is the monitoring and recordkeeping requirement as contained in the permit. The text immediately following the monitoring and recordkeeping requirement is an abridged version of the permit condition(s) for which monitoring and recordkeeping is required.

- **Daily aggregate throughput of the rock-crushing plant**
Throughput is limited to 500 T/hr and 8,000 tons per calendar day as established by a previous analysis. Interstate is required to monitor and record the throughput daily to comply with the throughput limits.
- **Hours of Crusher operations per day**
Crushing operations are limited to 16 hr/day and 4,800 hr/yr as established by a previous analysis. Interstate is required to monitor and record the hours of operations to comply with the permit limits.
- **Type of dust suppressants and locations of applications**
Several permit conditions specifically require that fugitive dust be controlled using water or chemical dust suppressants. To assure that fugitive dust is controlled, Interstate is required to monitor and record the type of dust suppressant used and the location (haul road, transfer point, crusher, screen, stockpile, etc.) of the application. Records are required daily.
- **Frequency of application of each type of dust suppressant**
This monitoring and recordkeeping requirement is supplemental to the previous requirement in that it requires Interstate to not only monitor and record the type of dust suppressant used but also how often, or the frequency, the dust suppressant is applied. Records are required daily.
- **Amount of dust suppressant applied per application**
Lastly, the amount of the dust suppressant applied per application is required to be monitored and recorded along with the previous two requirements. By performing the required dust control measures and then monitoring and recording that those measures are indeed being done to control fugitive dust, DEQ and the general public can be reasonably assured that the ambient air quality is being protected.

7. PUBLIC COMMENT

An opportunity for public comment period for the PTC application was provided on the application as required by IDAPA 58.01.01.209.01.c. No entity requested a public comment period.

8. RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommend that final PTC No. P-030123 be issued to Interstate Concrete and Asphalt Co. for their portable rock crushing facility. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

BR/sd Permit No. P-030123

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APPENDIX A

Interstate Concrete and Asphalt Co., PTC No. P-030123

Aerometric Information Retrieval System Information

A. AEROMETRIC INFORMATION RETRIEVAL SYSTEM INFORMATION

Table A.1 AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
POLLUTANT							
SO ₂							U
NO _x							U
CO							U
PM ₁₀	B					B	U
PT (Particulate)	B		B			B	U
VOC							U
THAP (Total HAPs)							U
			APPLICABLE SUBPART				
			000				

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- 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).