STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

July 28, 2016

John Shogren, VP
Interstate Concrete & Asphalt, Sandpoint Facility
P.O. Box 3366
Spokane, WA 99220-3366

RE: Facility ID No. 017-00048, Interstate Concrete & Asphalt, Sandpoint Facility, Sandpoint
Final Permit Letter

Dear Mr. Shogren:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2016.0007 Project 61676 to Interstate Concrete & Asphalt, Sandpoint Facility located at Sandpoint for the Tier II operating permit renewal and for converting the Tier II operating permit to a PTC. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received March 8, 2016.

This permit is effective immediately and replaces Tier II Operating Permit and Permit to Construct No T2-2010.0069 Project 0001 issued on March 18, 2011. This permit does not release Interstate Concrete & Asphalt, Sandpoint Facility from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Air Quality Analyst, at (208) 769-1422 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, 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, I encourage you to contact Shawnee Chen at (208) 373-0502 or Shawnee.chen@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\SYC
Permit No. P-2016.0007 PROJ 61676
Enclosures

AIR QUALITY

PERMIT TO CONSTRUCT

Permittee	Interstate Concrete and Asphalt Company
Permit Number	P-2016.0007
Project ID	61676
Facility ID	017-00048
Facility Location	1000 Baldy Mountain Road Sandpoint, ID 83864

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued July 28, 2016

Shawnee Chen, P.E., Permit Writer

Mike Simon, Stationary Source Manager

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1. PERMIT SCOPE

Purpose

1.1 This permitting action is a Tier II operating permit renewal with no changes to the existing operations. This permitting action converts the Tier II operating permit to a Permit to Construct (PTC) as requested by the applicant.

[7/28/2016]

1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.

[7/28/2016]

1.3 This PTC replaces Tier II Operating Permit and Permit to Construct No T2-2010.0069 Project 0001 issued on March 18, 2011.

[7/28/2016]

Regulated Sources

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	**Hot Mix Asphalt (HMA) Plant** Drum Dryer Manufacturer: Aesco Madsen Model: CFM250 Rated heat capacity: 75.6 MMBtu/hr Maximum hourly asphalt production: 300 tons/hr Allowable dryer fuels: natural gas, propane, ASTM Grade 1 fuel oil, ASTM Grade 2 distillate fuel oil, and used oil	Baghouse Manufacturer: AESCO Model: ASB-420 NSPS standard: 0.04 gr/dscf
	Asphalt Storage Tank Heater Rated heat input capacity: 2.2 MMBtu/hr Fuel type: Natural gas	None
4	**Concrete Batch Plant** Manufacturer: SPOMAC Model: NA Maximum hourly throughput: 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%	Cement storage silo baghouses are process equipment

Permit Section(s)	Source Description	Emissions Control(s)
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 ESCDS dust control Fugitive Dust Control Plan, May 2, 1995 Paved road sweep and water spray A concrete batch plant building houses aggregate and sand transferring to elevated storage, weigh hopper loading, and truck loadout.

[3/18/2011]

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, at a minimum, include 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 Except for the drum dryer stack of hot mix asphalt plant as specified in Section 3 of the permit, the permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) 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%, as measured using Method 9, 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 its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emission 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.

[3/18/2011]

Open Burning

2.9 The permittee shall comply with the requirements in IDAPA 58.01.01.600-623, Rules for Control of Open Burning.

Reports and Certifications

2.10 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 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

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

[7/28/2016]

2.12 Reserved

Sulfur Content

2.13 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

2.14 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 five-year period and shall be made available to DEQ representatives upon request.

Air Pollution Emergency Rules

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

Incorporation by Reference

2.16 Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to Standards of Performance of New Stationary Sources (NSPS), 40 CFR Part 60, Subpart I.

For permit conditions referencing or cited in accordance with any document incorporated by reference, should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[3/18/2011]

2.17 **NSPS 40 CFR 60, Subpart A –General Provisions**

The permittee shall comply with the requirements of 40 CFR 60, Subpart A – General Provisions. A summary of applicable requirements for affected facilities is provided in Table 2.1.

Table 2.1 NSPS 40 CFR 60, SUBPART A – SUMMARY OF GENERAL PROVISIONS FOR OWNERS AND OPERATORS OF AFFECTED FACILITIES

Section	Subject	Summary of Section Requirements
60.4	Address(es)	• All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart I shall be submitted to: 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
60.7(a),(b), and (f)	Notification and Recordkeeping	• Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date. • Notification shall be furnished of initial startup postmarked within 15 days of such date. • Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made. • Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative. • Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.
60.8	Performance Tests	• At least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present. • Within 60 days of achieving the maximum production rate, but not later 180 days after initial startup, performance test(s) shall be conducted and a written report of the results of such test(s) furnished. • Performance testing facilities shall be provided as follows: Sampling ports adequate for test methods applicable to such facility. Safe sampling platform(s). Safe access to sampling platform(s). Utilities for sampling and testing equipment. • Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f).
60.11(a), (d), (f), and (g)	Compliance with Standards and Maintenance Requirements	• When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8. • At all times, including periods of startup, shutdown, and malfunction, the owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. • For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
60.11(b), (c), and (e)	Compliance with Standards and Maintenance Requirements (Opacity)	• Compliance with opacity standards shall be determined by Method 9 in Appendix A of 40 CFR 60. The permittee may elect to use COM measurements in lieu of Method 9, provided notification is made at least 30 days before the performance test. • The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided. • Opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 in accordance with the requirements and exceptions in 40 CFR 60.11(e).
60.12	Circumvention	• No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.
60.14	Modification	• A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14. • Within 180 days of the completion of any physical or operational change, compliance with all applicable

Section	Subject	Summary of Section Requirements
		standards must be achieved.
60.15	Reconstruction	• An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.

[3/18/2011]

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 two storage tanks. One tank has an electric heater, and the other is heated using natural gas fired heater.

The asphalt plant also loads raw aggregate into haul trucks from a front-end loader.

The facility uses online power and does not have generators on site.

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

[3/18/2011]

3.2 Emissions Control Description

The gas stream from the HMA silo filling operation is routed to the drum dryer, and particulate matter (PM) emissions from the drum dryer 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. The emissions from the natural gas fired tank heater are uncontrolled.

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
Natural gas fired tank heater	None

[3/18/2011]

3.3 Equipment Specifications

3.3.1 Aesco/Madsen CFM250 Drum Dryer.

- Maximum 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 shall not exceed 300 T/hr and is allowed upon the continued use and maintenance of all emissions control devices defined 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_{10} emissions rate limits listed in Table 3.2.

3.3.2 AESCO Model ASB-420 Baghouse

- Baghouse Design Performance:

  Manufacturer guaranteed grain loading concentration: 0.04 gr/dscf or less.

3.3.3 Asphalt Storage Tank Heater

- Maximum rated heat input capacity: 2.2 MMBtu/hr
- Fuel type: Natural gas

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_{10} emissions from the drum dryer stack shall not exceed any corresponding emissions rate limit listed in Table 3.2.
- 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.

Table 3.2 ASPHALT PLANT EMISSIONS LIMITS [a]

Source Description	PM_{10} [b] (lb/hr)
Drum dryer stack (all fuel types)	7.22 [c]
Asphalt Tank Heater	0.0164 [d]
Vehicle fugitive dust (Paved and unpaved)	0.072 [e]
Process fugitive dust	0.73 [d]

a. In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring, and record keeping requirements.
b. Particulate matter with and aerodynamic diameter less than or equal to a nominal ten (10) micrometers including condensable particulate as defined in IDAPA 58.01.01.006.
c. PTC limit as determined by source test methods prescribed by IDAPA 58.01.01.157..
d. 24-hour average.
e. Pounds per hour clock hour.

[7/28/2016, PTC Condition, Sandpoint SIP]

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 Reserved

3.7 Reserved

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, Sandpoint SIP]

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 Reserved

3.13 Operations and Maintenance Manual Requirements

Within 60 days of permit issuance, the permittee shall have developed a Baghouse Filter System Procedures document for the inspection and operation of the baghouse filter system which controls particulate matter emissions from the asphalt drum mixer. The Baghouse Filter System Procedures document shall be a permittee-developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse Filter System Procedures document shall describe the procedures that will be followed to comply with the General Compliance General Provisions and shall contain requirements for weekly see/no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse Filter System Procedures document shall include a schedule and procedures for corrective action that will be taken if visible emissions are present from the asphalt drum mixer baghouse at any time. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of each baghouse filter system inspection. The records shall include, but not be limited to, the following:

- Date and time of inspection,
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse Filter System Procedures document shall be submitted to DEQ within 60 days after permit issuance and shall contain a certification by a responsible official. Any changes to the Baghouse Filter System Procedures document shall be submitted within 15 days of the change.

The Baghouse Filter System Procedures document shall remain on-site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring, and recordkeeping requirements specified in the Baghouse Filter System Procedures document are incorporated by reference into this permit and are enforceable permit conditions.

[7/28/2016]

3.14 Reserved

Monitoring and Recordkeeping Requirements

3.15 Operating Parameters Monitoring

The permittee shall monitor and record the following information. Records 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.

[7/28/2016, Sandpoint SIP]

3.16 Performance Tests

3.16.1 Reserved

3.16.2 The permittee shall conduct performance tests using test methods specified in Table 3.4 at a frequency of no less than once every year to demonstrate compliance with the emissions limits for the hot-mix asphalt drum dryer listed in Permit Condition 3.4.

Table 3.4 TEST METHODS FOR CORRESPONDING EMISSIONS LIMITS

Emissions limit	Test Method [a]	Special Conditions
PM_{10} emissions rate in lb/hr	EPA Method 201A with EPA Method 202, or EPA Method 5 with EPA Method 202	
PM grain loading	EPA Method 5	The sampling time and sample volume for each run shall be at least 60 minutes and 0.90 dscm (31.8 dscf) in accordance with 40 CFR 60.93.
Opacity	EPA Method 9 and IDAPA 58.01.01.625	The observer shall be certified in accordance with EPA Method 9 and holding an up-to-date, valid certification.

[a] Or DEQ-approved alternative in accordance with IDAPA 58.01.01.157

[3/18/2011, Sandpoint SIP]

3.16.3 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 type of fuel burned and the fuel flow rate in cubic feet per hour for gas and gallon per hour for liquid
- The percentage of RAP usage
- The pressure drop across the baghouse
- The visible emissions observed during the performance tests
- Operating variables used to demonstrate worst-case normal operating conditions

[3/18/2011, Sandpoint SIP]

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]

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.

The facility uses on line power and does not have generators on site.

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.

4.2.3 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.

4.2.4 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.

4.2.5 A concrete batch plant building houses aggregate and sand transferring to elevated storage, weigh hopper loading, and truck loadout.

[3/18/2011]

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
Aggregate and sand transferring to elevated storage, weigh hopper loading, and truck loadout	Inside concrete batch plant building

[3/18/2011]

4.3 Equipment Specifications

Cement Silo Baghouses

- Silo No. 1 is served by a Besser Appco DSC-250 Dust Collector (Minibaghouse).
- Silo No. 2 is served by a Besser Appco DSC-260 Dust Collector (Minibaghouse).
- Performance design characteristics: 99.9% efficiency for Portland Cement emission control for both baghouses.

[3/18/2011]

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.

[Sandpoint SIP]

- 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 concrete batch plant shall not exceed any corresponding emissions rate limit listed in Table 4.2.

Table 4.2 CONCRETE BATCH PLANT EMISSIONS LIMITS [a]

Source Description	PM_{10} [b] lb/hr
Cement silo baghouses	0.015 [c]
Vehicle fugitive dust (Paved and unpaved roads)	0.043 [d]
Process fugitive dust	0.35 [d]

a. In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and record keeping requirements.
b. Particulate matter with and aerodynamic diameter less than or equal to a nominal ten (10) micrometers including condensable particulate as defined in IDAPA 58.01.01.006.
c. 24-hour average.
d. Pounds per hour clock hour

[3/18/2011, Sandpoint SIP]

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.

[Sandpoint SIP]

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 years period.

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. GENERAL PROVISIONS

General Compliance

6.1 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, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)

[Idaho Code §39-101, et seq.]

6.2 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.

[IDAPA 58.01.01.211, 5/1/94]

6.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

6.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

6.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

6.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

- 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; and
- 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.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

6.7 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.

6.8 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.

6.9 Within 60 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.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

6.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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. 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.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

6.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

6.12 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.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

6.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

6.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

6.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

6.16 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.

[IDAPA 58.01.01.211, 5/1/94]