Statement of Basis

Permit to Construct No. P-2016.0007
Project 61676

Interstate Concrete and Asphalt Company
Sandpoint Facility
Sandpoint, Idaho

Facility ID No. 017-00048

Final

July 28, 2016
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The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01.et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CBP	concrete batch plant
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
COMS	continuous opacity monitoring systems
cy	cubic yard
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EF	emissions factor
EI	emissions inventories
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
gpm	gallons per minute
gph	gallons per hour
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HMA	hot mix asphalt
hp	horsepower
hr	hour
hr/yr	hours per year
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
Interstate	Interstate Concrete and Asphalt Company
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NAICS	North American Industry Classification System

NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_X	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
PAH	polyaromatic hydrocarbons
PC	permit condition
PCB	polychlorinated biphenyl
PERF	Portable Equipment Relocation Form
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTC/Tier II	permit to construct and Tier II operating permit
PTE	potential to emit
RACT	Reasonably Available Control Technology
RACM	Reasonably Available Control Measure
RAP	recycled asphalt pavement
RFO	reprocessed fuel oil
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SCL	significant contribution limits
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO_2	sulfur dioxide
SO_X	sulfur oxides
T/yr	tons per consecutive 12-calendar month period
Tier II	Tier II operating permit
T2	Tier II operating permit
TAP	toxic air pollutants
TEQ	toxicity equivalent
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compounds
yd^3	cubic yards
$\mu g/m^3$	micrograms per cubic meter

FACILITY INFORMATION

Description

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

Permitting History

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

Permit Type	Permit Number	Issue Date	Expiration Date	Project	Status
T2	017-00048	7/7/1995	7/7/2000	RACT/RACM implementation for attainment date extension project	S
T2	017-00048	6/21/1996	7/7/2000	Modification of control equipment specifications.	S
T2	017-00048	4/29/1998	7/7/2000	Modification (permit language for fugitive dust control methods)	S
T2	T2-990001	8/2/1999	8/2/2004	Add two mini-baghouses to two cement silos	S
PTC/T2	T2-040102	6/28/2005	6/28/2010	T2 renewal and PTC modification to allow using used oil for the dryer.	S
PTC/T2	P-060113	6/14/2006	6/28/2010	PTC modification to allow an increase in hourly HMA production from 200 ton/hr to 300 ton/hr and an operation change from a batch dryer to a drum dryer.	S
PTC/T2	P-060121	6/26/2006	6/28/2010	PTC revision	S
PTC/T2	T2-2010.0069 Project 0001	3/18/2011	3/18/2016	Tier II renewal with no changes in operations	A, but will become S upon issuance of this permit

Application Scope

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 PTC as requested by the applicant.

Application Chronology

March 8, 2016	DEQ received an application.
April 6, 2016	DEQ determined that the application was incomplete.
April 11, 2016	Interstate requested a re-visit to the option of converting the Tier II operating permit to a PTC.
April 25, 2016	DEQ decided to allow for converting the Tier II operating permit to a PTC, and modeling is not required for the PTC without changes to the existing operations.
May 3, 2016	DEQ determined that the application was complete.
May 20, 2016	DEQ received a PTC application fee.

May 25, 2016	DEQ made available the draft permit and statement of basis for peer and regional office review.
June 28, 2016	DEQ made available the draft permit and statement of basis for applicant review.
July 26, 2016	DEQ received PTC processing fee of $250.
July 28, 2016	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Devices

This permitting action does not change any existing operations. Information on emissions units and control devices are taken from the existing Tier II/PTC No. T2-2010.0069 Project 0001 issued on March 8, 2011.

Table 1 EMISSIONS UNIT AND CONTROL DEVICE INFORMATION

Source Description	Control Equipment Description
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 Asphalt Storage Tank Heater Rated heat input capacity: 2.2 MMBtu/hr Fuel type: Natural gas	Baghouse Manufacturer: AESCO Model: ASB-420 NSPS standard: 0.04 gr/dscf None
Concrete Batch Plant Manufacturer: SPOMAC Model: NA Maximum hourly throughput: 75 cy/hr of concrete Cement Storage Silo No.1 Baghouse No.1 Manufacturer: Besser Appco Model: DSC-250 Efficiency: 99.9% Flyash Storage Silo No. 2 Baghouse No. 2 Manufacturer: Besser Appco Model: DSC-250 Efficiency: 99.9%	A concrete batch plant building houses aggregate and sand transferring to elevated storage, weigh hopper loading, and truck loadout. Cement storage silo baghouses are process equipment
Fugitive Dust Sources Vehicle fugitive dust (paved and unpaved roadways) Process fugitive dust	Reasonable control (Permit Condition 2.1) Engineered drop point enclosures Baghouses ESCDS dust control Fugitive Dust Control Plan, May 2, 1995 Paved road sweep and water spray

Emissions Inventories

The applicant submitted the emissions inventories (EI) using DEQ's standard spreadsheets for the concrete batch plant and hot mix asphalt plant. The facility-wide PTE is presented in the following table. The EI spreadsheets can be found in the application (2016AAG914).

Table 2 POTENTIAL TO EMIT FOR CRITERIA POLLUTANTS[a]

Plant	PM (T/yr)	PM_{10} (T/yr)	CO (T/yr)	NO_x (T/yr)	SO_2 (T/yr)	VOC (T/yr)	Pb (T/yr)	HAPs (T/yr)
Concrete Batch Plant (CBP)	2.8	1.4	--	--	--	--	5	0
Hot Mix Asphalt Plant (HMA)	2.7	1.8	9.6	4.3	0.8	2.5	2	0.77
Total	**5.5**	**3.2**	**9.6**	**4.3**	**0.8**	**2.5**	**3.5×10^{-3}**	**0.77**

[a] Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits..

Ambient Air Quality Impact Analyses

Modeling analysis is not required because no changes are made to the existing facility.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located within AQCR 63 and UTM zone 11. The facility is located in Bonner County and in the Sandpoint PM_{10} maintenance Area and is subject to PM_{10} Maintenance Plan. The county is designated as an attainment or unclassifiable area for carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone, particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers ($PM_{2.5}$), and sulfur oxides (SOx). Outside of the boundary of the Sandpoint PM_{10} maintenance area, the county is unclassifiable for PM_{10}. There are no Class I areas within 10 kilometers of this location.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For THAPs (Total Hazardous Air Pollutants) Only:

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

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

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

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

UNK = Class is unknown

For All Other Pollutants:

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

SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the

pollutant are ≥ 80 T/yr.

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

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

UNK = Class is unknown.

Table 3 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION[1]

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

[1] Information taken from the SOB for PTC No. P-060121 issued on June 26, 2006.
[2] Assume PM_{10}=$PM_{2.5}$=PM

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 ..... Permit to Construct Required

The applicant has requested to convert the Tier II operating permit to a PTC. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 ..... Tier II Operating Permit

The applicant has requested to convert the Tier II operating permit to a PTC. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

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

(https://yosemite.epa.gov/r10/AIRPAGE.NSF/8be3ce98191c7f0988256c140074ee64/46290d390c6c9eb188257b56006dfda3!OpenDocument)

The facility is subject to Sandpoint, Idaho, PM_{10} Maintenance Plan, specifically, is subject to some requirements in the Tier II operating permit issued to the facility on 8/2/1999. These permit conditions are noted as Sandpoint SIP in this PTC.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301 ..... Requirement to Obtain Tier I Operating Permit

The facility's potential to emit is less than major source thresholds for all air pollutants. The facility is not a major source in accordance with IDAPA 58.01.01.008.10. Therefore, it is not subject to Title V program.

NSPS Applicability (40 CFR 60)

40 CFR 60 Subpart I - Standards of Performance for Hot Mix Asphalt Facilities

This permitting action does not trigger any new NSPS requirements. The facility is continuously subject to 40 CFR 60 Subpart I - Standards of Performance for Hot Mix Asphalt Facilities. No requirements in the Subpart have been revised since the Tier II was originally issued in 1995.

DEQ is the administrator for this subpart because this subpart is delegated to DEQ.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any requirements in 40 CFR Part 61.

MACT Applicability (40 CFR 63)

The facility is not subject to any requirements in 40 CFR Part 63.

Permit Conditions Review

This section describes only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action. If permit conditions contain requirements from Sandpoint, Idaho, PM_{10} Maintenance Plan, "Sandpoint SIP" will be added to brackets located directly under the permit conditions and on the right-hand margin.

Permit Condition 1.1

Permit Condition 1.1 states the purpose of this permitting action.

Permit Condition 1.2

Permit Condition 1.2 states that 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.

Permit Condition 1.3

Permit Condition 1.3 states which permit is to be replaced by the newer issued PTC.

Permit Condition 2.8

"Except for the drum dryer stack of hot mix asphalt plant as specified in Section 3 of the permit," is added to PC 2.8 because the visible emissions inspection for drum dryer stack is weekly as specified in Section 3 of the permit.

Permit Condition 2.11

"Receiving a Tier II operating permit" is replaced with "Receiving a PTC" because this permitting action has converted the Tier II operating permit to a PTC.

Old Permit Condition 2.12

Old PC 2.12 regarding the grain loading standard for fuel burning equipment is removed and is replaced with "reserved" because no fuel burning equipment is on site.

Permit Condition 3.3.1

DEQ has changed 'Conditional Control Measures' in PC 3.3.1 to 'emissions control devices' as requested by the applicant for clarification purpose. Refer to DEQ's response to Facility Comment 1 in Appendix A for details and discussions.

Table 3.2

While the drum dryer stack is subject to a PM_{10} emissions limit of 2.3 lb/hr in Sandpoint, Idaho, PM_{10} Maintenance Plan, the facility was permitted to a higher PM_{10} emissions limit in 2006 when the facility applied for a PTC modification to increase hourly HMA production from 200 ton/hr to 300 ton/hr and to change operation from a batch dryer to a drum dryer. The higher limit was approved in accordance with IDAPA 58.01.01.200 and is maintained in the permit.

Permit Condition 3.10

While the drum dryer stack is subject to lower hourly and daily throughput limits in Sandpoint, Idaho, PM_{10}

Maintenance Plan, the facility was permitted to the higher throughput limits in 2006 when the facility applied for a PTC modification to increase hourly HMA production from 200 ton/hr to 300 ton/hr and to change operation from a batch dryer to a drum dryer. The higher emissions limit corresponding to the higher throughput limits was evaluated in accordance with SIP approved IDAPA 58.01.01.200, modeled and approved. The higher throughput limits are kept in the permit.

Permit Conditions 3.12, 3.13, 3.14, and 3.15

The existing PC 3.12 requiring the facility to daily monitor the pressure drop across the baghouse is removed and is replaced with "reserved". The existing PC 3.14 requiring the facility to keep records of baghouse pressure drop is also removed and is replaced with "reserved". The requirement of monitoring baghouse pressure drop is removed in PC 3.15. This is because according to the DEQ's internal guidance for baghouse, the see/no see visible emissions inspection is more effective than the baghouse pressure drop monitoring. PC 3.13 is updated using the standard permit conditions in the DEQ's internal guidance for baghouse. Weekly see/no see is required according to the guidance.

"Beginning two years prior to June 28, 2005 (the initial issuance of the Tier II Operating Permit and Permit to Construct No. T2 040102)" is removed from PC 3.15. Refer to Facility Comment 3 in Appendix A for details and discussions.

Permit Condition 3.16.1

The initial testing requirement in PC 3.16.1 is removed and is replaced with "reserved" because the initial performance testing requirement has been fulfilled.

Old Permit Conditions 3.18 and 3.19

Old PCs 3.18 and 3.19 are deleted as they duplicate requirements in General Provisions 6.8 and 6.9.

Permit Condition 5.6.1

PC 5.6.1is revised. "beginning two years prior to June 28, 2005 (the initial issuance date of Tier II Operating Permit and Permit to Construct No. T2-040102)" is removed. Refer to Facility Comment 6 in Appendix A for explanations.

General Provisions

General Provisions taken from the current template are used.

PUBLIC REVIEW

Public Comment Period

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period is not required or provided in accordance with IDAPA 58.01.01.209.04

PROCESSING FEE

This permitting action does not require engineering analysis; therefore, the PTC processing fee for this permitting action is $250 in accordance with IDAPA 58.01.01.225.

APPENDIX A – FACILITY DRAFT COMMENTS

The following comments were received from the facility on July 15, 2016:

Facility Comment 1:

Condition 3.3.1, 3rd bullet - This condition references 'Conditional Control Measures' and with the capitalization appears to reference a specific standard or ideal. This language was also included in the 3/18/2011 permit, but we are not familiar with this phraseology and I understand that you were not immediately familiar with it either.

Requested Resolution: For purposes of making the permit user friendly for all levels of operations, please reconsider this language and if it represents a specific standard, please advise. If it is simply the language to reference Condition 3.2, then more accurate language may be 'emissions control devices defined [stipulated] [required] in Permit Condition 3.2'.

DEQ Response: This permit condition first appeared in the June 28, 2005 Tier II operating permit. The conditional control measures were specified in PC 3.2.1 in the 2005 permit, and PC 3.2.1 was title as "Enclosing of Drop Points for Conditional Control Measures." It did not appear to have any separate Conditional Control Measures besides the requirements in PC 3.2.1. This permit condition has been carried over to later permits.

DEQ has changed 'Conditional Control Measures' in PC 3.3.1 to "emissions control devices' as requested by the applicant.

Facility Comment 2: Condition 3.4.2, Table 3.2, Drum dryer stack (all fuel types), PM_{10} 2.3 lb/hr. This condition has reduced the previously permitted limit of 7.22 lb/hr to 2.3 lb/hr by stating that the value of 2.3 lb/hr is included in the Idaho SIP (ref: SOB page 9). Idaho DEQ has made several revisions to the Idaho SIP since the original inclusion of this condition in 1994 (https://yosemite.epa.gov/r10/AIRPAGE.NSF/SIPs/SIPs/Idaho/SIPIdahoFedApprovedRules). The whole purpose of the air permitting rules is to provide a process whereby facilities can be created and modified while still ensuring public protection. The higher limit was evaluated in accordance with SIP approved IDAPA 58.01.01, modeled and approved prior to issuance of the 3/18/2011 permit. The SIP emissions inventory is a baseline, not the definitive list of all sources under Idaho DEQ's jurisdiction.

DEQ Response: While the drum dryer stack is subject to an emissions limit of 2.3 lb/hr in the Sandpoint, Idaho, PM_{10} Maintenance Plan, the facility was permitted to a higher emissions limit in 2006 when the facility applied for a PTC modification to increase hourly HMA production from 200 ton/hr to 300 ton/hr and to change operation from a batch dryer to a drum dryer. A PM_{10} full impact analysis was conducted (see January 20, 2011modeling memo for project 0001) at the higher PM_{10} emission limit of 7.22 lb/hr and NAAQS compliance was achieved. The previously approved permit limit for PM_{10} of 7.22 lb/hr will be maintained in this permit. The PM_{10} limit of 2.3 lb/hr from the Sandpoint SIP will not be placed into this permit as it remains a federally enforceable limit in the SIP.

Facility Comment 3: Condition 3.15, Operating Parameters Monitoring - The introductory paragraph stipulates retention of records but states "Beginning two years prior to June 28, 2005 (the initial issuance of the Tier II Operating Permit and Permit to Construct No. T2040102), the records shall be kept on site for the most recent five-year period ...". The condition alludes to the standard record retention requirements of 2-years from the original PTC (prior to 2005), and increases the record retention period to 5-years. Since this PTC will be effective July 2016 and the record retention requirement has been 5-years for more than five years, the prepositional phrase "Beginning two years prior to June 28, 2005 (the initial issuance of the Tier II Operating Permit and Permit to Construct No. T2-040102)," is cumbersome, beyond the scope of Idaho DEQ's auditing history, and unnecessary to ensuring 5-years of records.

Requested Resolution: Interstate Concrete & Asphalt requests that the language be revised to "~~Beginning two years prior to June 28, 2005 (the initial issuance of the Tier II Operating Permit and Permit to Construct No. T2 040102), the records~~ Records shall be kept on site for the most recent five-year period ... "

DEQ Response: The requested change is made.

Facility Comment 4: Condition 3.16.1, Initial Performance Test - This condition is standard language for a PTC and was met subsequent to Idaho DEQ's issuance of 8/2/1989 permit (and testing performed annually thereafter). Including the condition in the permit encumbers the permit with conditions that are inapplicable.

Requested Resolution: Interstate Concrete & Asphalt requests that the condition be removed, the condition be replaced with the word "Reserved" and the Statement of Basis be updated to indicate that initial performance testing was performed.

DEQ Response: The requested change is made.

Facility Comment 5: Condition 3.16.2, Periodic Performance Testing - This condition requires annual performance testing to demonstrate compliance with the pound per hour, grains per dry standard cubic feet, and opacity limits of Condition 3.4. Interstate Concrete and Asphalt has been performing this testing annually since 1989 and submits that the annual testing requirement is onerous in comparison to performance testing requirements of its competitors. Interstate Concrete and Asphalt recognizes that this condition was included in the permit which is the baseline of the Idaho SIP, but the testing requirement itself or the absence thereof does not affect the baseline emissions inventory. Interstate Concrete & Asphalt has consistently met the emissions limits as documented in performance test reports submitted to Idaho DEQ.

Requested Resolution: Interstate Concrete & Asphalt requests that the condition be Environmental, Inc. modified to be consistent with other asphalt and manufacturing plants and include a graduated testing requirement such that emissions at or above 75% of the emission limit trigger annual testing, emissions between 50% and 75% of the emission limit, trigger testing every 3 years, and emissions less than 50% of the emission limit, trigger testing every 5 years.

DEQ Response: The annual source test requirement is taken from the Sandpoint SIP and is kept in the permit. According to annual source test data (from 2006 to 2015), the drum dryer has been consistently meet the permit limit of 7.22 lb/hr, but has three exceedances to the SIP limit of 2.3 lb/hr.

Facility Comment 6: Condition 5.6.1, ESCDS Application Log - The introductory paragraph stipulates retention of records but states"... 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 of the Tier II Operating Permit and Permit, to Construct No. T2-040102)." The condition alludes to the standard record retention requirements of 2-years from the original PTC (prior to 2005), and increases the record retention period to 5-years. Since this PTC will be effective July 2016 and the record retention requirement has been 5-years for more than five years, the prepositional phrase "beginning two years prior to June 28, 2005 (the initial issuance of the Tier II Operating Permit and Permit to Construct No. T2-040102)," is cumbersome, beyond the scope of Idaho DEQ's auditing history, and unnecessary to ensuring 5-years of records.

Requested Resolution: Interstate Concrete & Asphalt requests that the language be revised to "... 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 of the Tier II Operating Permit and Permit to Construct No. T2-040102~~).

DEQ Response: The requested change is made.

Facility Comment 7: Condition 6.5 and Condition 6.6, bullets 1, 3, 4 & 5, Construction and Operation Notification - These conditions are PTC general conditions and were met subsequent to Idaho DEQ's issuance of 8/2/1989 permit. Including the condition in the permit encumbers the permit with conditions that are inapplicable.

Requested Resolution: Interstate Concrete & Asphalt requests that the conditions be removed or that the Statement of Basis be updated to state that "these conditions have previously been met but that the PTC template does not allow customization of the General Provisions.

DEQ Response: Conditions 6.5 and 6.6 are the permit conditions in General Provisions. General Provisions are standard conditions that are included in every PTC and will be kept as they are. Since this permitting action is a Tier II operating permit renewal with no changes to the existing operations and is for converting the Tier II operating permit to a PTC, Conditions 6.5 and 6.6 are not applicable for this permitting action.

Facility Comment 8: Conditions 3.12, 3.13, 3.14 and 3.15, Removal of the requirement to install, maintain, and monitor a magnehelic for pressure drop monitoring across the baghouse and institution of a monthly see/no see visible emissions inspection of the baghouse Interstate Concrete & Asphalt accepts the revisions' as presented.

DEQ Response: According to DEQ's guidance, the permittee is required to perform weekly see/no see visible emissions inspection. The "monthly" frequency was put in the draft permit by mistake; it is corrected.