



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Permit to Construct No. P-050125

Final

Interstate Concrete and Asphalt Company

Concrete Batch Plant

Rathdrum, Idaho

Facility ID No. 055-00048

January 2, 2009

Harbi Elshafei *HE.*

Permit Writer

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

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CO	carbon monoxide
cy/hr	cubic yards per hour
cy/yr	cubic yard per year
DEQ	Department of Environmental Quality
HMA	hot mix asphalt
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
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	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
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T2/PTC	Tier II operating permit and permit to construct
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

STATEMENT OF BASIS

Permittee:	Interstate Concrete and Asphalt Company	Permit No.	P-050125
Location:	Rathdrum, Idaho	Facility ID No.	055-00048

1. FACILITY INFORMATION

1.1 Facility Description

The Interstate Concrete and Asphalt Company (Interstate) has a Tier II Operating Permit and Permit to Construct (T2/PTC) No. 055-00048, issued November 27, 2002. That permit was issued to Central Pre-Mix and contains provisions for a hot mix asphalt plant (HMA), rock crushing plant, and a concrete batch plant. The HMA and the crushing plant were issued separate PTCs by DEQ. That leaves only the concrete batch plant permitted under the Tier II operating permit. Interstate requested to delete the HMA and rock crushing plant from the November 27, 2002 permit and also requested to have the name of ownership changed to Interstate. Therefore, this PTC is for the concrete batch plant rated at 300 cubic yards per hour (cy/hr), which is the same plant that existed in the Tier II Operating Permit and Permit to Construct, issued November 27, 2002.

The concrete batch plant receives raw materials at the site by truck, and the raw materials are then dumped onto storage piles or conveyed into storage silos. Sand, coarse aggregate, cement, and cement supplement (flyash) are stored on site in silos. These raw materials are combined to form the final concrete product. Upon demand for concrete, the raw materials are weighed and dumped into a cement truck in the appropriate proportions. The concrete batch plant is totally enclosed except for the primary aggregate charging conveyor. The baghouses are entirely inside the enclosure except for the stacks which penetrate the enclosure's roof. Mixer trucks are loaded from the mixer to a below-grade loading ramp. Water is added and the slurry is mixed and prepared for off-site delivery of the final product.

It should be noted that because the HMA and the concrete batch plant (CBP) are included in the same facility ID No. 055-00048, the HMA and the CBP are part of a single facility, but they are covered under separate permits.

1.2 Permitting Action and Facility Permitting History

This permitting action is to revise the concrete batch plant provisions of the facility's T2/PTC, issued November 27, 2002, and to change the ownership and facility name of the company from Central Pre-Mix to Interstate Concrete and Asphalt Company.

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).

March 27, 2007	PTC No. P-060067, HMA Plant, PTC modification for the construction of a new drum mix dryer. This permit superseded P-040101. (A)
February 18, 2005	PTC No. P-040101, Facility ID No. 055-00048, Interstate Concrete and Asphalt Company, "HMA Plant." PTC for the construction of a new hot-mix asphalt plant. This PTC superseded the HMA provisions in T2/PTC No. 055-00048 and incorporated an ownership change from Central Pre-Mix to Interstate Concrete and Asphalt Company. (S)
November 27, 2002	T2/PTC No. 055-00048, T2/PTC revision. Transfer of ownership and company name change from ACME Materials and Construction to Central Pre-Mix Concrete Company. (S)
February 29, 2000	PTC No. 055-00048, this PTC issued to ACME Materials and Construction for a hot-mix asphalt plant, rock crushing plant, and concrete batch plant. (S)

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March 14, 1995 PTC No. P-940221, this PTC issued to ACME Materials and Construction for a permit revision to correct typographical error for PTC No. 777-00058. Paragraph 3.7 of PTC No. 777-00058 made a reference to an “asphalt plant” and to a minimum pit depth requirement for plant operation. Paragraph 3.7 in the permit was inadvertently included, was not pertinent to the permit and was deleted in this permit. (S)

July 16, 1991 PTC No. P-910403, this PTC issued to ACME Materials and Construction for a permit construction of concrete and asphalt production facility in Rathdrum, Idaho. (S)

2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

2.1 Application Scope

Interstate Concrete and Asphalt Company submitted a Permit to Construct (PTC) application which requested a permit revision to delete the hot mix asphalt (HMA) and the crusher sections existing in Tier II Operating Permit and Permit to Construct No. 055-00048, issued November 27, 2002. This permit was issued to Central Pre-Mix and incorporates provisions for an HMA plant, a permanent rock crusher plant, and a concrete batch plant. The permanent rock crusher included in that permit no longer exists at the facility. Rocks are crushed at the plant on an as needed basis by permitted portable rock crusher(s). The HMA plant was issued its own PTC No. P-040101 on February 18, 2005 and was modified on March 27, 2007. Thus, this PTC is for the concrete batch plant that is rated at 300 cubic yards per hour (cy/hr), which is the same plant included in the Tier II Operating Permit and Permit to Construct, issued November 27, 2002. This permit is also for a change in ownership and facility name of the company from Central Pre-Mix to Interstate Concrete and Asphalt Company.

This PTC replaces the concrete batch plant section existing in Tier II Operating Permit and Permit to Construct No. 055-00048, issued on November 27, 2002, the terms and conditions of which shall no longer apply. In this permit, the concrete production was limited to a maximum 1,752,000 cubic yards per any consecutive 12-month period. However, the permittee agreed to limit the concrete production to 1,000,000 cubic yards per any consecutive 12-month period – see Appendix B

The permittee also requested to change the ownership of the concrete batch plant from Central Pre-Mix to Interstate Concrete and Asphalt Company, change the facility contact, and the responsible official.

2.2 Application Chronology

February 11, 2005	Permit application was received.
November 16, 2005	Application was determined complete.
April 30, 2007	Additional information was received via email in which Interstate agreed to limit concrete production to 1,000,000 cubic yards per year.
November 20, 2008	DEQ provided the draft permit to Coeur d’Alene regional office for review and comments.
November 25, 2008	DEQ provided the draft permit to the facility for review and comments. Company did not comment on the draft permit per email sent to permit writer on December 15, 2008; see Appendix D.

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December 15, 2008

DEQ received the stack parameters for the cement storage silo baghouse and the manufacturer and the model number of the weigh batcher.

January 2, 2009

DEQ received the \$1,000.00 fee from Interstate.

January 9, 2009

DEQ issued final PTC No. P-050125 to Interstate, Rathdrum facility, for the revision to concrete batch plant.

3. TECHNICAL ANALYSIS

3.1 Emission Unit and Control Device

Table 3.1 EMISSION UNIT AND CONTROL DEVICE INFORMATION

Emission Unit /ID No.	Emissions Unit Description	Control Device Description	Emissions Discharge Point ID No. and/or Description
<u>Central Mix Concrete Batch Plant</u> Manufacturer: NA Maximum production capacity: 300 cubic yards of concrete per hour (cy/hr)	Central Mix Concrete Batch Plant	<u>Enclosure – batch plant and loadout are located inside a building</u> Estimated particulate control: 75% <u>Cement and Flyash Storage Silos Baghouse:</u> Manufacturer: Dusty Dustless Model: U-216 Number of bags: 216 Cloth Area: 1520 square feet Particulate control efficiency: 99.9% <u>Cement Storage Silo Baghouse:</u> Manufacturer: Besser Appco Model: DCS-260 Number of bags: 42 Cloth Area: 260 square feet Particulate control efficiency: 99.9% <u>Weigh Batcher Baghouse:</u> Manufacturer: Rex, model 512-5791-80 <u>Truck Loadout Rubber Boot Enclosure or equivalent</u> <u>Material Transfer Point Water Sprays or equivalent</u>	<u>Cement and Flyash Storage Silos Baghouse Stack:</u> Height above ground: 28.5 feet (ft) Stack diameter: 1.6 ft Stack flow rate: 12,000 acfm <u>Cement Storage Silo Baghouse Stack:</u> Height above ground: 56 ft Stack diameter: 7 inches Stack flow rate: 550 acfm

3.2 Emissions Inventory

An emissions inventory is not applicable for this project. No increase in emissions resulted from the project because the facility requested a decrease in concrete production from the allowable amount of 1,752,000 cubic yards per year (cy/yr) that is found in T2/PTC No. 055-00048, issued November 27, 2002, to 1,000,000 cy/yr.

3.3 Ambient Air Quality Impact Analysis

Modeling is not required for this project because there will be no increase of any air pollutant emissions will result from this project. See DEQ's modeling memo in Appendix C.

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4. REGULATORY REVIEW

4.1 Attainment Designation (40 CFR 81.313)

The facility is located in Kootenai County which is designated as attainment or unclassifiable for PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone. Reference 40 CFR 81.313.

4.2 Permit to Construct (IDAPA 58.01.01.201)

The applicant has applied to change provisions related to concrete batch plant in Tier II Operating Permit and Permit to Construct No. 055-00048, issued November 27, 2002 to PTC

4.3 Tier II Operating Permit (IDAPA 58.01.01.401)

When this PTC is issued, all provisions of T2/PTC No. 055-00048 will no longer apply. The concrete batch plant provisions are superseded by this PTC, and the HMA provisions were superseded by PTC No. P-060067, issued March 27, 2007. The IDAPA 58.01.01.401 requirements will therefore no longer be applicable to this facility.

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

The facility is not a major source as defined under IDAPA 58.01.01.008. Therefore, it is not subject to the Title V program.

4.5 PSD Classification (40 CFR 52.21)

The facility is not subject to PSD requirements because the facility is not a major facility and this permitting action is not a major modification.

4.6 NSPS Applicability (40 CFR 60)

Not applicable.

4.7 NESHAP Applicability (40 CFR 61)

Not applicable.

4.8 MACT Applicability (40 CFR 63)

Not applicable. The concrete batch plant is not a major source for Hazardous Air Pollutants and is not in any area source category for which a MACT has been promulgated.

4.9 CAM Applicability (40 CFR 64)

Not applicable because the facility does not meet the first criterion for CAM applicability; it is not a Title V facility.

4.10 Permit Conditions Review

This section describes the permit conditions for only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

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Revised PTC's Cover Page

DEQ included a NAICS (North America Industry Classification System) code on the cover page of this permit to reflect changes that have been made to DEQ's PTC template. The NAICS code for this facility is 327320, *Ready-Mix Concrete Manufacturing and Distributing*.

Additionally, the most updated PTC General Provisions are included in this permit.

Permit condition 2.4.1 limits the concrete production to 1,000,000 cubic yards per any consecutive 12-calendar month period, which reflects the reduction in the annual production level from 1,752,000 cy/yr as requested by Interstate in an email to DEQ on April 30, 2007 – please refer to Appendix B of this document for an email from Corky Witherwax of Interstate to Harbi Elshafei of DEQ.

Permit Condition 2.4.2 is new and limits the daily concrete production to 4,800 cubic yards per day. The Wyoming Avenue plant is currently surrounded by farmland, and no modeling demonstration has been conducted to date to ensure that the plant's operations will not cause or significantly contribute to a violation of any air standard. Dispersion modeling conducted by DEQ for "typical" concrete batch plants suggested that a minimum setback of 150 meters between the concrete batch plant and the ambient air boundary would be necessary to ensure that the 24-hour PM₁₀ National Ambient Air Quality Standard (NAAQS) would not be exceeded. A daily limit has therefore been added as a reasonable permit condition.

Permit Condition 2.6 is new and provides a better description of fugitive dust control strategies. DEQ's current PTCs for concrete batch plant operations include fugitive dust control strategies.

Permit Condition 2.8 requires daily production monitoring to demonstrate compliance with the daily production limit in Permit Condition 2.4.2, in addition to the existing requirement for monthly and 12-month rolling average monitoring to comply with the annual production limit in Permit Condition 2.4.1.

Permit Condition 2.9 requires monthly monitoring rather than the quarterly visible emissions monitoring in existing Permit Condition 2.4.

Permit Condition 2.10 is new and requires daily monitoring for fugitive emissions on any day that the concrete batch plant is operated. DEQ's current PTCs for concrete batch plant operations include daily monitoring for fugitive emissions.

Existing permit conditions 5.4 (Monitoring Equipment), 5.6 (Pressure Drop Across Air Pollution Control Device) and 5.7 (Monitoring of Pressure Drop) in the current Tier II OP/PTC, which was issued on November 27, 2002, are deleted in this PTC. DEQ's current PTCs for concrete batch plant operations don't include pressure drop monitoring for these sources.

Periodic performance testing of the baghouses was not required in the existing permit and has not been added as a provision in this PTC. Routine inspections and maintenance of the baghouses and see/no see inspections should be sufficient to demonstrate that the baghouses are being properly operated.

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5. PERMIT FEES

In accordance with IDAPA 58.01.01.225, the facility is subject to a processing fee of \$1,000 because the increase in emissions is less than one ton per year (the emissions from this source decreased). The processing fee was estimated by using DEQ's PTC fee calculation spreadsheet - Appendix B.

6. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.209.04, an opportunity for public comment was not required because the permit revision does not result in an increase in emissions

Appendix A – AIRS Information

AIRS/AFS Facility-wide Classification Form

Facility Name: Interstate Concrete and Asphalt Company - This AIRS is for the Concrete Batch Plant
Facility Location: Rathdrum
Facility ID: 055-00048 **Date:** 11/13/2008
Project/Permit No.: P-050125 **Completed By:** Harbi Elshafei

- Check if there are no changes to the facilitywide classification resulting from this action. (compare to form with last permit)
- Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

	SO ₂	PM ₁₀	VOC
Area Classification:	U	U	U

DO NOT LEAVE ANY BLANK

Check one of the following:

- SIP [0]** - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)
- OR
- Title V [V]** - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO ₂	NO _x	CO	PM ₁₀	PT (PM)	VOC	THAP
Classification:				B	B		

- PSD [6]** - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO ₂	NO _x	CO	PM ₁₀	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- NSR - NAA [7]** - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

	SO ₂	NO _x	CO	PM ₁₀	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- NESHAP [8]** - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

- NSPS [9]** - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO ₂	NO _x	CO	PM ₁₀	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- MACT [M]** - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

Appendix B – Correspondence From Company

I tried sending an email to you a few days back in regards to limiting total cubic yards and it was sent back as undeliverable. As per our conversation Interstate would be willing to accept a limit of cubic yards produced per year. If I recall our conversation we agreed to limiting production to 1,000,000 per year.

Corky Witherwax
Aggregate Sales/Credit/
Environmental Manager

-----Original Message-----

From: Harbi.Elshafei@deq.idaho.gov [mailto:Harbi.Elshafei@deq.idaho.gov]
Sent: Monday, April 30, 2007 3:44 PM
To: Witherwax, Corky
Subject: FW: Wyoming Concrete Batch Plant Info

From: Harbi Elshafei
Sent: Monday, April 30, 2007 4:40 PM
To: 'Witherwax, Corky'
Subject: RE: Wyoming Concrete Batch Plant Info

No problems, Corky.

As I discussed with you earlier via phone that you will send us a letter or an email in which you will accept a production rate limit of 80,000-100,000 cubic yards per year instead of the permitted 1.75 million cubic yards of concrete per year that is limited in the Tier II OP, issued on 11/27/02. You mentioned to me your facility can never reach the permitted limit of 1.75 million cubic yards /yr and that you can take 850,000 cubic yards/yr instead since your actual production for the year 2006 was 63,000 cubic yards/yr.

Thanks, Corky.

Harbi Elshafei
Idaho DEQ

From: Witherwax, Corky [mailto:cwitherwax@oldcastlematerials.com]
Sent: Monday, April 30, 2007 4:21 PM
To: Harbi Elshafei
Subject: RE: Wyoming Concrete Batch Plant Info

Sorry for the slow response!

Corky Witherwax
Aggregate Sales/Credit/
Environmental Manager

-----Original Message-----

From: Harbi.Elshafei@deq.idaho.gov [mailto:Harbi.Elshafei@deq.idaho.gov]
Sent: Monday, April 30, 2007 3:19 PM
To: Witherwax, Corky
Subject: RE: Wyoming Concrete Batch Plant Info

Thanks I got it.

Harbi Elshafei
Idaho DEQ.

From: Witherwax, Corky [mailto:cwitherwax@oldcastlematerials.com]
Sent: Monday, April 30, 2007 4:10 PM
To: Harbi Elshafei
Subject: Wyoming Concrete Batch Plant Info

Here is the information that you requested on the silo baghouses and spray bars.

We have two original silos, for cement and flyash, and the dust collector located on the main batch drum that are controlled by the following.

Manufacturer: Dusty Dustless
Model: U-216
Cloth Area: 1520 Square Feet
No. of Bags: 216
Max. Air Cap.: 12,000 DFM
Sack Height: 28.5 ft.
Efficiency: 99.9%

The (3rd) newest silo is controlled by the following:

Manufacturer: Besser Appco
Model: DCS-260
Cloth Area: 260 Square Feet
No of Bags: 42
Filtering Velocity: 2.12 FPM
Flow Rate: 550 CFM

All raw aggregate that is fed into the concrete batch plant is kept in a moist condition therefore eliminating dust. The entire plant, except the initial feed bins, is located inside a building so it is not subject to wind.

Corky Witherwax
Aggregate Sales/Credit/
Environmental Manager

PTC Fee Calculation

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: Interstate Concrete & Asphalt Co.
Address: 845 W. Kathleen St.
City: Coeur d'Alene
State: Idaho
Zip Code: 83815
Facility Contact: Corky Witherwax
Title: Environmental Manager
AIRS No.: 055-00048

- N** Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
- Y** Did this permit require engineering analysis? Y/N
- N** Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	0	0.0
SO ₂	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	0.0	0	0.0
Fee Due	\$1,000.00		

Comments:

No increase in emissions resulted from the project.

Appendix C – Ambient Air Quality Impact Analysis

Harbi,

The following is my understanding of the project as you described to me:

1. The permit is an administrative permitting project for the most part, removing provisions for other plants that are no longer in existence or now addressed by other permits.
2. The permit is for a permanent facility, not a portable.
3. The new permit will not relax any permit provisions affecting air quality impacts, such as setback distances, emissions control requirements, stack parameters, etc.
4. The new permit will not increase throughput for the plant or add emissions sources not previously allowed by the existing permit.

Based on the nature of the project as described above, an air impact analysis is not required for the project because of the following:

1. Idaho Air Rules Section 203.02 requires that no permit be granted unless the applicant shows that the modification would not cause or significantly contribute to a violation of any ambient air quality standard. Since the plant has been operating under an existing Tier II permit, DEQ may assume that impacts of those emissions were shown to not cause or significantly contribute to a violation of an air quality standard. Additional analyses are not needed since there will be no changes that increase emissions or affect operations such that impacts to air quality could worsen.
2. Idaho Air Rules Section 203.03 require that no permit be granted unless the applicant shows that the modification demonstrates compliance with TAP increments. Since there will be no increase in emissions associated with the modification, compliance with TAP increments is assured.

Please contact me if you have any questions or concerns regarding my interpretation of this project and the applicability of air impact analyses.

Kevin Schilling
Stationary Source Air Modeling Coordinator
Idaho Department of Environmental Quality
208 373-0112

Appendix D – Facility Comments

From: Witherwax, Corky [mailto:cwitherwax@oldcastlematerials.com]
Sent: Monday, December 15, 2008 2:05 PM
To: Harbi Elshafei
Subject: PTC # 055-00048 Draft

Harbi,

I have looked over the above draft and it looks as though it is in accordance with our conversations. Thank you for your assistance in getting this done.

Corky Witherwax
Aggregate Sales/Credit
Environmental Manager
208.666.6116