



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

OFFICE OF
AIR AND WASTE

Mr. James Essig
Granite Construction Company
1525 E. Marine Drive
Everett, Washington 98201

Dear Mr. Essig:

The U.S. Environmental Protection Agency, Region 10 (EPA) would like to ensure that the Granite Construction Company (Granite) fully understands the EPA air permits that apply to its hot mix asphalt (HMA) plant and stone quarrying, crushing, and screening (SQCS) facility co-located at 249-B Rodeo Trail Drive in Okanogan, Washington on the Colville Reservation (Source). The HMA must comply with the EPA's synthetic minor source permit issued to the plant on February 8, 2019¹ when it becomes effective. The SQCS is subject to the EPA's General Permit on September 22, 2016². These permits contain federally-enforceable limitations that will assure the potential to emit of the facilities are less than the Title V major source thresholds and therefore the facilities will be considered minor sources under the Federal Minor New Source Review (NSR) Program in Indian Country (40 CFR Parts 49.151-161).

The EPA's synthetic minor permit for the HMA plant was issued to replace the EPA's General Permit for Hot Mix Asphalt Plants (HMA GP). The HMA GP was issued to the Source on September 22, 2016 along with the SQCS GP. The synthetic minor permit will become effective on March 11, 2019. Once effective, the Source's HMA plant will no longer be subject to the HMA GP and will only need to comply with the HMA synthetic minor source permit.

The issuance of the HMA synthetic minor source permit and replacement of the HMA GP has no effect on the applicability of the SQCS GP. The SQCS facility at the Source has been and remains subject to and must comply with the SQCS GP as specified by the EPA's Approval of the Request for Coverage, dated September 22, 2016. As part of the EPA's approval, the SQCS facility is required to comply with Condition 16 of the SQCS GP, which applies to co-located HMA plants and SQCS facilities. Granite elected to comply with this requirement in their Request for Coverage for SQCS Facilities, dated August 8, 2016.

In addition, the EPA determined that the operation of Granite's HMA plant and SQCS facility at the same site are one source. Accordingly, the synthetic minor source permit and SQCS GP contain federally-enforceable limitations to restrict the potential to emit from the combined operations to less than the Title V major source thresholds. As a result, Granite is not required to obtain a Title V permit for the HMA or SQCS and will be considered a minor source under the EPA's minor NSR regulations in

¹ <https://www.epa.gov/sites/production/files/2019-02/documents/granite-okanogan-synthetic-minor-source-final-permit-2019.pdf>

² <https://www.epa.gov/caa-permitting/stone-quarrying-crushing-and-screening-facilities-general-air-quality-permit-0>

Indian country. For more information, please see the Permit Analysis supporting the HMA synthetic minor source permit which contains a full analysis of these issues³.

If you have any questions regarding this response, please contact me at (206) 553-1679, or electronically at mcfadden.kelly@epa.gov.

Sincerely,

\s\ March 5, 2019

Kelly McFadden, Manager
Stationary Source Unit

cc: Kris Ray,
The Confederated Tribes of the Colville Reservation

³ https://www.epa.gov/sites/production/files/2019-02/documents/granite-okanogan-synthetic-minor-source-final-permit-analysis-2019_0.pdf