

Statement of Basis

**Permit to Construct No. P-2008.0162
Project ID 61436**

**US Ecology Idaho, Inc.
Grand View, Idaho**

Facility ID 073-00004

Final

**December 30, 2014
Dan Ritman, P.E.
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

CO	carbon monoxide
DEQ	Department of Environmental Quality
HAP	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
PM	particulate matter
PTC	permit to construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
TAP	toxic air pollutants
VOC	volatile organic compounds

FACILITY INFORMATION

Description

The process description does not change as a result of this permitting action. The process description from the previous Statement of Basis¹ is included here without change.

US Ecology Idaho is a solid and hazardous waste treatment, storage, and disposal facility. Waste is trucked to the facility and prepared for disposal in landfill cells onsite. Waste is treated in two different areas of the facility; the Containment and Stabilization Building, and in Outdoor Stabilization.

The Containment and Stabilization Building is divided into two separate rooms; one room is used for containment operations (sorting, and crushing and screening), and the other room is used for indoor stabilization operations. The rooms are separated by an overhead door that allows forklift and backhoe traffic to pass.

Containment operations include sorting, waste transfer, and crushing and screening.

The indoor stabilization process produces stable products by mixing waste with reagents in either of two mixing tanks capable of holding up to 60 tons of untreated waste each, or in two steel mixing bin tanks in the debris handling portion of the building. Common reagents are cement, lime, ferrous sulfate (FeSO₄), and clay.

Outdoor stabilization operations produce stable products by mixing with reagents in either of two mixing bins capable of holding up to 30 tons of untreated waste each.

Emissions from these processes are PM, VOCs, HAPs, and TAPs. VOC emissions are negligible because the waste streams are not volatile; however, there are minor amounts of VOCs. HAP and TAP emissions from the waste are mostly metals. TAPs emissions are also associated with process reagents used to stabilize the waste.

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).

January 27, 2009	PTC No. P-2008.0162 issued as a PTC revision to the facility-wide permit to improve baghouse monitoring conditions (S)
July 26, 2007	Letter for Project No. O-2007.0108 issued to clarify that PTC is not required for two additional steel mixing bin tanks inside of the Containment and Stabilization Building. Operation of these units is already addressed by the existing permit. (A)
June 9, 2006	Tier II/PTC No. P-040020 issued as a facility-wide permit and to establish PTC conditions for the Containment operations and for Indoor and Outdoor Stabilization operations (S)
July 16, 1997	PTC No. 073-00004 (Project No. P-960103) issued as initial PTC for the Waste Stabilization Building (S)

Application Scope

This is a revised permit to construct (PTC) to change requirements for the operation of air pollution control equipment in the indoor waste stabilization operations in accordance with the Consent Order signed by DEQ on September 24, 2014 (Case number E-2014.0002, TRIM Record No. 2014AAJ408).

¹ Statement of Basis for US Ecology Idaho, Inc., January 21, 2009 – TRIM Record #2009AAG12

Application Chronology

September 24, 2014	DEQ signed a Consent Order which required Ecology to obtain a PTC (Enforcement Case No. E-2014.0002).
October 8, 2014	DEQ received an application.
October 9, 2014	DEQ received an application fee.
November 17, 2014	DEQ determined that the application was complete.
November 19, 2014	DEQ made available the draft permit and statement of basis for peer and regional office review.
December 3, 2014	DEQ made available the draft permit and statement of basis for applicant review.
December 10, 2014	DEQ received the permit processing fee.

TECHNICAL ANALYSIS/ REGULATORY ANALYSIS

The purpose of this permitting action is solely to revise the existing air pollution control requirements for the indoor waste stabilization operations as specified in the Consent Order signed by DEQ September 24, 2014 (Case number E-2014.0002, TRIM Record No. 2014AAJ408).

The technical analysis documented in the previous Statement of Basis on January 21, 2009 does not change and is not repeated in this Statement of Basis.

Similarly, the regulatory analysis does not change as a result of this permitting action and is not repeated in this Statement of Basis.

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.

Existing Permit Condition 4.6

This existing permit condition is shown below with revisions to the condition underlined.

When conducting stabilization operations involving waste streams that meet the definition of “fine wastes” as determined in Appendix A of this permit, the permittee shall operate the building ventilation baghouse and HEPA filter. Silo baghouses shall be operated during silo filling operations. Each of these air pollution control devices shall be operated according to manufacturer’s recommendations and specification and in accordance with Permit Condition 2.1 and General Provision 6.2.

The terms “Paint Filter Determination” in Appendix A shall mean EPA Method 9095B

These changes are made to meet the requirements of 11.A of the Consent Order signed by DEQ September 24, 2014 (Case number E-2014.0002, TRIM Record No. 2014AAJ408) which provides:

“In order to resolve Violation Nos. 1-66, US Ecology shall revise its PTC in order to allow for the treatment of waste material that does not meet the definition of “fine” as described in Attachment 2 Figure C-11 of its RCRA Permit (See Appendix A), in the Indoor Stabilization Building without needing to operate the building ventilation baghouse and HEPA filter and referenced in US Ecology’s June 6, 2014 correspondence.”

Appendix A has been added to the permit.

Revised Permit Condition 4.9

This condition was added to the permit to determine compliance with Permit Condition 4.6. It requires keeping records on all fine waste determinations for all wastes treated in the indoor stabilization operations.

The permit cover page has been updated to the current cover page.

All other permit conditions remain unchanged.

PUBLIC REVIEW

Public Comment Opportunity

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

APPENDIX A – PROCESSING FEE

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: US Ecology Idaho, Inc.
 Address: 20400 Lemley Road
 City: Grand View
 State: Idaho
 Zip Code: 83614
 Facility Contact: Terry Geis
 Title: Responsible Official
 AIRS No.: 073-00004

- N Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
- n 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	\$ 250.00		

Comments: This permitting action was solely to add provision of a consent order. Emissions stay the same.