



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

August 11, 2009

Certified Mail No. 7190 0596 0014 0000 6831

Patrick Dooley, Operations Manager
Pacific Recycling
19100 NW Waste Site Drive
Mayfield, ID 83716

RE: Facility ID No. 039-00030, Pacific Recycling, Mayfield
Final Permit Letter

Dear Mr. Dooley:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2009.0072 to Pacific Recycling for an existing metal recycling hammer mill located at Mayfield, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on May 18, 2009, and supplemental information provided on June 23, 2009; July 17, 2009; and July 20, 2009. This permit is effective immediately. This permit does not release Pacific Recycling 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 Thomas Krinke, Air Quality Compliance Officer, at (208) 373-0419 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends 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 Mary Capiral at (208) 373-0502 or Mary.Capiral@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\MC\hp

Project No. P-2009.0072

Enclosure



**Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality**

PERMIT No.: P-2009.0072
FACILITY ID No.: 039-00030
AQCR: 64 **CLASS:** B **ZONE:** 11
SIC: 5093 **NAICS:** 423930
UTM COORDINATE (km): 586.4 km (Easting),
4,791.8 km (Northing)

1. PERMITTEE

Pacific Recycling

2. PROJECT

Initial PTC for a metal recycling hammer mill

3. MAILING ADDRESS

19100 NW Waste Site Drive

CITY

Mayfield

STATE

ID

ZIP

83716

4. FACILITY CONTACT

Patrick Dooley

TITLE

Operations Manager

TELEPHONE

(208) 941-1969

5. RESPONSIBLE OFFICIAL

Patrick Dooley

TITLE

Operations Manager

TELEPHONE

(208) 941-1969

6. EXACT PLANT LOCATION

19100 NW Waste Site Drive Mayfield, ID 83716

COUNTY

Elmore

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Scrap metal recycling

8. PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and 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.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the 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.

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

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

Mary Capral

MARY CAPRAL, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

Mike Simon

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:

DATE ISSUED:

August 11, 2009

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAP	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
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
PCBs	Polychlorinated biphenyls
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
PTE	potential to emit
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
TAP	toxic air pollutants
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This permit is for the initial PTC for an existing metals recycling hammer mill.

Regulated Sources

1.2 Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 REGULATED SOURCES

Permit Section	Source Description	Emissions Control
2	<u>Metal recycling hammer mill</u> Mfr.: Metso Texas Model: 80 X 104 Max. Capacity: 90 T-feed/hr, 24 hrs/day (Limited to 302,000 tons of feed per any consecutive 12-month period) Year of Construction: 2008	<u>Water injection system</u> Mfr.: Metso Texas Model: 80 X 104 Year of installation: 2008

2. HAMMER MILL

2.1 Process Description

The hammer mill processes household appliances, scrap metal recovered from landfill excavations, and approximately 10% pre-crushed automobiles.

2.2 Emissions Control Description

The hammer mill is equipped with a factory installed variable water injection system for particulate control.

Table 2.1 HAMMER MILL DESCRIPTION

Emissions Unit / Process	Emissions Control Device	Emissions Point
<u>Hammer mill</u> Mfr.: Metso Texas Model: 80 X 104 Max. Capacity: 90 T/hr, 24 hrs/day (Limited to 302,000 tons of feed per any consecutive 12-month period) Year of Construction: 2008	<u>Water injection system</u> Mfr.: Metso Texas Model: 80 X 104 Year of installation: 2008	N/A

Emissions Limits

2.3 Emissions Limits

The PM₁₀ emissions from the hammer mill stack shall not exceed 0.21 pounds per hour (0.21 lb-PM₁₀/hr) or 0.35 tons per any consecutive 12-calendar month period (0.35 T-PM₁₀/yr).

2.4 Opacity Limit

Emissions from the hammer mill stack, or any other stack, vent, or functionally equivalent opening associated with the hammer mill, 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. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.5 Throughput Limit

To demonstrate compliance with the PM₁₀ emissions limit, the feed throughput through the hammer mill shall not exceed 90 tons per hour (90 T-feed/hr) or 302,000 tons per any consecutive 12-month period (302,000 T-feed/yr)

2.6 Material Screening and Acceptance

The permittee shall not accept any mercury- or PCB-containing/contaminated materials to be processed through the hammer mill. The following unacceptable materials include batteries, gas tanks, tires, radiators, transmissions, capacitors, and transformers (unless specifically marked "non-PCB").

2.7 Water Injection System Requirement

The hammer mill shall not be operated without the water injection system installed and operating.

Monitoring and Recordkeeping Requirements

2.8 Annual Operating Hours Monitoring

The permittee shall monitor and record daily operating hours of the hammer mill. Records shall show that operation of the hammer mill does not exceed 3,356 hours per any consecutive 12-month period (3,356 hrs/yr).

2.9 Monitoring of Water Injection System

The permittee shall perform an inspection of the water injection system at least once per day of operation for malfunctions, including but not limited to leaks or clogged flow lines and other conditions such as adequate flow rate and alignment of nozzles.

2.10 Water Injection System Operating Log

The permittee shall maintain an operating log for the hammer mill water injection system, including dates and times of inspections, details of observations, malfunctions (type, cause, and measures taken to correct), maintenance, and repairs.

2.11 Material Receipts

The permittee shall require a "Motor Vehicle, Appliance, & Material Supplier Contractual Certification" of all material suppliers who supply scrap metals to the facility. Records shall show that materials received to be processed through the hammer mill are not contaminated with mercury or PCBs.

2.12 Recordkeeping

The permittee shall comply with the recordkeeping requirements of General Provision 7.

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

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 and 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.]
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]
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

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. 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

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
 - c. 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;
 - d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and

- e. 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, 5/1/94]

Performance Testing

6. 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.

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.

Within 30 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]

Monitoring and Recordkeeping

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information 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 and 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

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. 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

10. 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

11. 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

12. 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

13. 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 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]