



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippetts, Director

December 15, 2015

Terry Andrew Geis
US Ecology Idaho, Inc.
P. O. Box 400
Grandview, ID 83624

RE: Facility ID No. 039-00018, US Ecology Idaho, Inc., Mayfield
Final Permit Letter

Dear Mr. Geis:

The Department of Environmental Quality (DEQ) is issuing a revised Permit to Construct (PTC) No. P-2015.0059 Project 61628 to US Ecology Idaho, Inc., located at Mayfield to change the name of the facility from Envirosafe Services of Idaho, Inc., (ESII) to US Ecology Idaho, Inc., (USEI). This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received November 9, 2015.

This permit is effective immediately and replaces PTC No. 039-00018, issued July 17, 1995. This permit does not release USEI from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

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 Michael Miller at (208) 373-0502 or michael.miller@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\tc

Permit No. P-2015.0059 PROJ 61628

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee US Ecology Idaho, Inc. (USEI)
Permit Number P-2015.0059
Project ID 61628
Facility ID 039-00018
Facility Location 17355 N.W. Ecology Rd.
Mayfield, ID 83716

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) 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; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) 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; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho 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. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued December 15, 2015



Michael Miller, Permit Writer



Mike Simon, Stationary Source Manager

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
bhp	brake horsepower
biogas	any gas fuel derived from the decay of organic matter, as the mixture of methane and carbon dioxide produced by the bacterial decomposition of sewage, manure, garbage, or plant crop
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
H ₂ S	hydrogen sulfide gas
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppmv	parts per million, volume
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SI	spark-ignited (refers to IC engines)
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1 Permit Scope

Purpose

- 1.1 This permit revision changes the name of the facility from EnviroSAFE Services of Idaho, Incorporated (ESII) to US Ecology Idaho.

This permit replaces Permit to Construct No. 039-00018, issued July 17, 1995.

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.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2.	General Building Ventilation System Manufacturer – Day Model Number – 128HPW8 Efficiency – 99.9% @ 1 micron (um) Maximum Grain Loading – 0.03 gr/dscf (guaranteed) Fan capacity – 24,000 acfm (minimum)	General Building Ventilation Baghouse
2.	Pneumatic Transfer System Manufacturer – Smoot Model Number – 84FR48 Efficiency – 99.9% @ 1 micron (um) Maximum Grain Loading – 0.03 gr/dscf (guaranteed) Fan capacity – 2,200 acfm (minimum)	Pneumatic Transfer System Baghouse

[12/15/2015]

2 Rail Transfer Facility (RTF)

2.1 Process Description

The facility is used as a transfer point to transfer solid hazardous and industrial waste (wastes) from rail cars to trucks. Waste loads are transferred to trucks inside the Rail Transfer Facility (RTF) and hauled off-site for subsequent management. No waste processing occurs inside the RTF. Two waste transfer operations are located inside the RTF: (1) the existing unloading of wastes from rail car to trucks, and (2) a proposed pneumatic rail car unloading system to unload fine particle wastes.

The existing transfer system uses a backhoe to unload wastes out of gondola rail cars to trucks. The waste is placed into the unloading beds of the trucks that will take the waste off-site. The building uses a general building ventilation baghouse to control particulate emissions from this transfer process.

The proposed pneumatic conveyance transfer system is used to transfer fine particulate waste. An air-tight chute is fitted onto each hopper of a hopper rail car. The waste is transferred one hopper at a time to a staging hopper. The waste is subsequently loaded into trucks for transport off-site. The air used to transfer the waste to the staging hopper is routed to a dedicated baghouse for particulate removal. A controlled discharge spout is used to dispense wastes into the trucks. In the discharge system, the material is transferred via the inner of two concentric feed pipes. Air is drawn through the outer of the two concentric pipes to remove dust generated from the material loading. The exhaust from the loading is routed to the general building ventilation baghouse for particulate removal.

The general building ventilation system fan capacity is such that a net negative pressure is maintained within the building with all the doors open. This system is designed to capture all dust within the building, allowing for air discharge only from the two baghouse exhaust stacks.

[12/15/2015]

2.2 Visible Emissions

Visible emissions from the general building ventilation baghouse stack or the pneumatic transfer system baghouse stack 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.

2.3 Fugitive Emissions

Visible fugitive emissions associated with the operation of this facility shall be reasonably controlled in accordance with IDAPA 16.01.01.650. Some of the reasonable precautions may include, but shall not be limited to, the following:

- Use of water, environmentally safe chemicals or dust suppressants on all unpaved haul roads;
- Covering of all trucks and rail cars; and
- Paving unpaved haul roads.

Operating Requirements

2.4 Transfer Limit – Existing Transfer System

The maximum amount of wastes transferred by the existing waste transfer system shall not exceed 213 tons per hour (T/hr) ; 1,865,880 tons per year (T/yr).

[12/15/2015]

2.5 Transfer Limit – Pneumatic Transfer System

The maximum amount of wastes transferred by the pneumatic waste transfer system shall not exceed 50 T/hr ; (438,000) T/yr.

[12/15/2015]

2.6 Baghouse Operations

Both baghouses shall be maintained in good working order and operated according to manufacturer's specifications to ensure the manufacturer's guaranteed grain loading of 0.03 grains per dry standard cubic foot (gr/dscf) is not exceeded the exhaust gas stream. The baghouses shall operate whenever waste is being transferred.

2.7 Pressure Drop Across Baghouses

The pressure drop across the baghouses shall be within \pm ten (10%) percent of the recommended manufacturer pressure drop.

Monitoring and Recordkeeping Requirements

2.8 Waste Transferred by Existing Transfer System

The permittee shall monitor daily, quarterly and annually based on a calendar year, the amount of wastes transferred by the existing transfer system. These amounts shall be recorded as tons (T) to demonstrate compliance with this permit and shall be recorded in a log kept at the facility for the most recent two (2) year period. The log shall be made available to Department representatives upon request.

[12/15/2015]

2.9 Waste Transferred by Pneumatic Transfer System

The permittee shall monitor daily, quarterly and annually based on a calendar year, the amount of wastes transferred by the pneumatic transfer system. These amounts shall be recorded as tons (T) to demonstrate compliance with this permit and shall be recorded in a log kept at the facility for the most recent two (2) year period. The log shall be made available to Department representatives upon request.

[12/15/2015]

2.10 Pressure Drop Monitoring

The permittee shall install, calibrate, maintain and operate, in accordance with the manufacturer's specifications, pressure drop monitoring equipment to continuously measure the pressure drop differential across the baghouses. The pressure drop shall be monitored once per week and recorded as inches of water (in. H₂O) to demonstrate compliance with this permit and shall be

recorded in a log kept at the facility for the most recent two (2) year period. The log shall be made available to Department representatives upon request. Documentation shall also be maintained on site verifying the recommended manufacturer's pressure drop that ensures the maximum grain loading of 0.03 gr/dscf.

[12/15/2015]

Reporting Requirements

2.11 Certification of Documents

All documents, including but not limited to, records, supporting information, or monitoring data submitted to the Department 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 documents are true, accurate, and complete.

3 General Provisions

General Compliance

3.1 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, 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.]

3.2 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]

3.3 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

3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 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

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

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- 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; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7** 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.
- 3.8** 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.
- 3.9** Within 60 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 and 4/11/15]

Monitoring and Recordkeeping

- 3.10** The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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, 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

- 3.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 3.12 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

- 3.13 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

- 3.14 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

- 3.15 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

- 3.16 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 58.01.01.211, 5/1/94]