STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

Governor Brad Little
Director John H. Tippets

September 9, 2019

Michelle Stayrook, Remediation Manager
Univar Solutions USA Inc.
4694 Cemetary Road
PMB 104
Hillard, Ohio 43026

RE: Facility ID No. 001-00096, Univar Solutions USA Inc., Boise
Final Permit Letter

Dear Ms. Stayrook:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2019.0048 Project 62294 to Univar Solutions USA Inc. located at Boise for a facility name change. 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 August 28, 2019.

This permit is effective immediately and replaces PTC No. P-060023, issued on August 4, 2006. This permit does not release Univar Solutions USA Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard St., Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with Dave Luft, Air Quality Manager, at (208) 373-0201 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that 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 Christina Boulay at (208) 373-0502 or christina.boulay@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\cb

Permit No. P-2019.0048 PROJ 62294

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	Univar Solutions USA Inc.
Permit Number	P-2019.0048
Project ID	62294
Facility ID	001-00096
Facility Location	140 Milwaukee Street Boise, Idaho 83704

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 September 9, 2019

Christina Boulay

Christina Boulay, Permit Writer

Mike Simon, Stationary Source Manager

Contents

1 Permit Scope

Purpose

1.1 This is a revised permit to construct (PTC) to change the facility name from, "Univar USA Inc." to "Univar Solutions USA Inc."

1.2 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.

1.3 This PTC replaces Permit to Construct No. P-060023, issued on August 4, 2006.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
1	Air Stripper with Ambersorb 563 Adsorbers	None

[8/4/2006]

2 Air Stripper With Ambersorb 563 Adsorbers

2.1 Process Description

2.1.1 Site Description:

From approximately 1973 to 1983, Univar Solutions USA Inc., formerly known as Univar USA Inc., has operated a small chemical distribution facility from a portion of a warehouse located on Friedly Drive, Boise Idaho. Univar Solutions USA Inc., reportedly stored PCE in an above-ground tank at this facility. Today, a Pier I Imports store occupies the general area where the warehouse, partially occupied by Univar Solutions USA Inc., was located.

Based on results of a soil gas survey, concentrations of perchloroethylene, dichloroethylene, trichloroethylene, ethyl benzene, and vinyl chloride are present in the soil at the former Univar Solutions USA Inc. facility.

[8/4/2006]

2.1.2 Air Stripper Control System Description

Univar Solutions USA Inc. proposes a pilot study using a vapor recovery and Ambersorb carbonaceous adsorbent units to recover volatile organic compounds (VOCs) from the subsurface. The unit is a self-contained, trailer-mounted, modular unit to allow for convenient set up and transportation to the site.

The vapor extraction system consists of a positive displacement blower, Ambersorb carbonaceous adsorbers, and associated controls. The module operates under positive ventilation to prevent the buildup of vapors inside the module. The extracted vapors are passed through dual activated Ambersorb adsorbers. These canisters are designed to operate a 3 ft/sec linear velocity or less. The adsorptive material will be Ambersorb 583 carbonaceous adsorbers.

Space is provided between the blower and the Ambersorb canisters to allow for installation of additional equipment to control humidity and secondary treatment systems should this prove necessary. Sampling ports are provided so the systems efficiency and air influent and effluent quality can be monitored. An additional sampling port is located between the beds.

The system can operate 24 hours per day. The Ambersorb 563 adsorbers are a design of the Rohm and Haas Company.

Horizontal perforated PVC piping will be placed in trenches at depths to optimize vapor removal and to prevent groundwater intrusion. The vapor recovery system modular will be connected to the horizontal vapor extraction piping using PVC piping.

Breakthrough will be detected using an organic vapor meter calibrated to manufacturer's specifications. When breakthrough is detected in the first Ambersorb bed, it will be replaced with the second bed and a new Ambersorb 563 carbonaceous adsorber will replace the second Ambersorb 563 bed. The initial extraction rate will be at 700 acfm or less. The second Ambersorb bed ensures that no inadvertent release of VOCs will occur due to unexpected breakthrough of the first canister.

Spent Ambersorb adsorbers will be manifested to an off-site RCRA TSD facility.

[8/4/2006]

2.1.3 Stack Specifications

The stack is 15 feet high and 0.3 foot in diameter. The exit velocity is 700 acfm maximum.

[8/4/2006]

2.2 Emissions Control Description

None

[8/4/2006]

Emission Limits

2.3 Emission Limits

The emissions of vinyl chloride, trans-1, 2-dichloroethene, cis-1, 2-dichloroethene, trichloroethylene, tetrachloroethylene, and ethyl benzene from the air stripper stack shall not exceed the pounds per hour (lb/hr) or pounds per consecutive 12-month period (lb/yr) values listed in Table 2.1.

Table 2.1 Air Stripper Emission Limits

Source Description	Vinyl Chloride		Trans-1, 2-dichloroethene		Cis-1, 2-dichloroethene		Trichloroethylene		Tetrachloroethylene		Ethyl Benzene	
	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr	lb/hr	lb/yr
Air Stripper	3.2E-4	2.8	9.9E-3	8.6	9.9E-3	8.6	1.3E-4	1.1	8.4E-4	7.4	1.1E-2	9.6

[8/4/2006]

Monitoring and Recordkeeping Requirements

2.4 Sampling Ports

Sampling ports shall be located at the influent and effluent stream to the primary and secondary Ambersorb canisters. Fittings and Teflon tubes shall follow the description in the applicant's submittal.

[8/4/2006]

2.5 Analytical Sampling

2.5.1 Samples for chemical components shall be collected using a Tedlar bag and sample size shall be 1.5 liters, according to the applicant's submittal. Both qualitative and quantitative analyses shall be performed using a GC/MS or another DEQ-approved method. A quality control and quality assurance document shall be submitted to DEQ for approval prior to sampling.

[8/4/2006]

2.5.2 Sampling shall be performed at the following schedule: 7 days after startup; 45 days after startup; once during the last week of the calendar quarter for the first year; and semi-annual, once in June and once in December, after the first year until the unit is removed from service. If the initial sampling shows concentrations higher than that submitted in the application, the permittee shall contact DEQ and obtain approval for a plan to sample more frequently.

[8/4/2006]

2.6 Ambient Monitoring

2.6.1 The permittee shall monitor for VOC breakthrough (breakthrough is defined as 2.5 times the background level) using a Model 580B Organic Vapor Meter (OVM), calibrated to manufacturer's specifications, at the influent and effluent sampling ports and at the sampling port between the Ambersorb 563 beds.

[8/4/2006]

2.6.2 If toxic concentrations per Section 2.5 prove to be equal to or less than the concentrations in the applicant's submittal, the OVM monitoring frequency shall be: daily for the first week of operation; every seventh day during the next four weeks of operation; and monthly thereafter, with a maximum of 31 days between sampling. If toxic concentrations per Section 2.5 prove to be greater than that submitted in the applicant's submittal, then the permittee shall contact DEQ for approval of a more frequent monitoring plan.

[8/4/2006]

Operating Requirements

2.7 Two Ambersorb canisters in series, exactly as described in the application, shall be present at all times.

[8/4/2006]

2.8 All spent Ambersorb adsorbers shall be treated as hazardous waste and properly manifested to an off-site RCRA transfer, storage, and disposal (TSD) facility for proper treatment and disposal.

[8/4/2006]

2.9 Within five (5) days after breakthrough is detected according to Section 2.5 above, a new Ambersorb canister shall be added to the system, and at the same time the canister due to breakthrough is removed.

[8/4/2006]

Reporting Requirements

2.10 Initial sampling of Section 2.5 shall be submitted to DEQ within seven (7) days after initial sampling. Subsequent sampling of Section 2.5 shall be submitted to DEQ within 30 days after sampling. All chemical species and quantities shall be included in the report.

[8/4/2006]

2.11 The permittee shall submit to DEQ time and dates breakthrough is detected and time and dates of canister replacement.

[8/4/2006]

2.12 The permittee shall submit ambient monitoring results of Sections 2.6 to DEQ within 14 days after ambient monitoring.

[8/4/2006]

2.13 The permittee shall submit, for DEQ approval, a quality control and quality assurance document in accordance with Section 2.5 and at least 30 days prior to initial sampling.

[8/4/2006]

2.14 The permittee shall report in accordance with Section 2.5.2 and 2.6.2 if analytical or monitoring results show higher concentrations than that submitted with the application.

[8/4/2006]

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; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- 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.

[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 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]