



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

November 24, 2009

Clay Handy, President
Handy Truck Line, Inc. Heyburn Terminal
PO Box 300
Paul, Idaho 83347

RE: Facility ID No. 067-00025, Handy Truck Line, Inc., Heyburn
Final Permit Letter

Dear Mr. Handy:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2009.0112 to Handy Truck Line, Inc. for an initial PTC at Heyburn, 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 August 20, 2009. This permit is effective immediately. This permit does not release Handy truck Line, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Twin Falls Regional Office, 1363 Fillmore St, Twin Falls, Idaho 83211, Fax (208) 736-2194.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Stephen Van Zandt, Air Quality Analyst, at (208) 736-4261 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 Eric Clark at (208) 373-0502 or Eric.Clark@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\EC

Project No. P-2009.0112



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

PERMIT No.: P-2009.0112

FACILITY ID No.: 067-00025

AQCR: 63 **CLASS:** SM **ZONE:** 12

SIC: 4225 **NAICS:** 4225

UTM COORDINATE (km): 273.8, 4,715

1. PERMITTEE

Handy Truck Line, Inc., Heyburn Terminal

2. PROJECT

Initial PTC for existing unpermitted facility

3. MAILING ADDRESS

PO Box 300

CITY

Paul

STATE

ID

ZIP

83347

4. FACILITY CONTACT

Clay Handy

TITLE

President

TELEPHONE

(208) 438-5072 ext. 24

5. RESPONSIBLE OFFICIAL

Clay Handy

TITLE

President

TELEPHONE

(208) 438-5072 ext. 24

6. EXACT PLANT LOCATION

Near the intersection of J Street and Shoshone St, Heyburn, Idaho 83336

COUNTY

Minidoka

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Fly ash transloading facility

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.

ERIC CLARK, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:

DATE ISSUED:

November 24, 2009

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
CAA	Clean Air Act
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
Handy	Handy Truck Line, Inc. Heyburn Terminal
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
NAICS	North American Industry Classification System
Pb	Lead
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SM	synthetic minor
T/yr	tons per year
UTM	Universal Transverse Mercator

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 The purpose of this permit to construct (PTC) is to permit this existing facility as required by Consent Order E-070018, which had an effective date of January 24, 2008.

Regulated Sources

1.2 Table 1. lists all sources of regulated emissions in this PTC.

Table 1.1 REGULATED SOURCES

Permit Section	Source Description	Emissions Control
2	<u>Railcar unloading to silos</u> Flyash delivery on railcars and gravity fed via air slide to the elevator and transferred to one of two silos	Baghouse
2	<u>Fly Ash loading from silos to truck load-out</u> Fugitive flyash and truck load-out	Boot/enclosure and baghouse control with negative pressure

2. FLYASH TRANSLOADING

2.1 Process Description

The Handy Truck Line, Inc. (Handy) Heyburn Terminal is a flyash transloading for commercial sales. Flyash is delivered to the facility by rail and transferred to one of two silos. A minimum of 80% is transferred to the transfer silo while the remaining 20% is placed in the storage silo. 14,800 T/yr flyash is the maximum throughput the facility handles. Each railcar carries 100 ton of flyash and three cars are used daily.

All flyash from the railcars is first gravity fed via air slide to the elevator. A boot acting as a sealant helps to limit the amount of potential fugitive dust. The control efficiency associated with this process is assumed to be 99.9%

Flyash is transferred by air slide to the elevator. The flyash that is not initially placed in the transfer silo is transferred from the storage silo to the other at some point. Each of these transfer processes are controlled by a Donaldson Torit Baghouse with 99.99% efficiency for PM₁₀. However, to build in some conservatism into the emission calculations only 99.9% efficiency was applied. The siloed flyash is then gravity-fed into delivery trucks. Again a sealing boot is applied to limit fugitive dust. The control efficiency of the truck load-out was determined by the controlled/uncontrolled ratio of AP-42 emission factors in Table 11.12-2. The resulting efficiency was 94.2%.

2.2 Emissions Control Description

Table 2.1 FLYASH TRANSLOADING DESCRIPTION

Emissions Unit / Process	Emissions Control Device	Emissions Point
Railcar to railcar unloading pit	<u>Boot Enclosure</u> Air tight seal Efficiency: 99.9%	<u>Fugitive Emissions</u>
Air Slide to silos and silo to silo transfer	<u>Baghouse</u> Manufacturer: Donaldson Torit Model: 48RF10 Maximum Capacity: 9,360 cfm Date Modification: 2009 Efficiency: PM/PM ₁₀ : 99.9%	<u>Baghouse Stack:</u>
Truck load-out	<u>Boot Enclosure</u> Efficiency: 94.2%	<u>Fugitive Emissions</u>

Emissions Limits

2.3 Emissions Limits

The PM₁₀ emissions from the baghouse and truck load-out shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 FLYASH TRANSLOADING EMISSIONS LIMITS¹

Source Description	PM ₁₀ ²
	lb/hr
Railcar to Elevator	0.008
Elevator to silos and silo transfer	0.036
Truck load-out	0.44

- 1 In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and record keeping requirements.
- 2 Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.81.

2.4 **Opacity Limit**

Emissions from the baghouse stack, or any other stack, vent, or functionally equivalent opening associated with the Heyburn Terminal, 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 Limits**

Flyash delivery and transfer shall be limited to 14,800 T/yr to demonstrate compliance with the PM₁₀ and lead emission limits.

2.6 **Operational Hours Limits**

Material handling and flyash transfer shall be limited to the following hours of operation:

- Eleven hours per day, seven days per week.

2.7 **Direct Transfer**

The permittee shall not directly transfer flyash from a railcar to a waiting delivery truck, in order to limit fugitive dust emissions.

2.8 **Baghouse/Boot Control Equipment**

The permittee shall install, maintain, and operate baghouse/cartridge filter systems or air tight boot enclosures to control PM₁₀ emissions:

- Produced by material transfer, storage, and handling from the:
 - Railcar to elevator transfer (boot)
 - Elevator to Storage Silos transfer (Baghouse)
 - Silo to silo transfer (Baghouse)
 - Transfer silo to delivery truck load-out (Boot)

Monitoring and Recordkeeping Requirements

2.9 Baghouse/Filter Systems Procedures

Within 60 days of the date of this permit, the permittee shall have developed a Baghouse/Filter System Procedures document for the operation and monitoring of the baghouses/filter system which control emissions from the sources listed in the emissions control description table. The Baghouse/Filter System Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse/Filter System Procedures document shall describe the procedures that will be followed to comply with General Provision 2 and shall contain requirements for weekly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse/Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at anytime. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The Permittee shall maintain records of the results of each baghouse/filter system inspections in accordance with General Provision 7. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The Baghouse/Filter System Procedures document shall be submitted to DEQ within 60 days of permit issuance for review and comment and shall contain a certification by a responsible official. Any changes to the Baghouse/Filter System Procedures document shall be submitted within 15 days of the change.

Air Quality Permit Compliance
Twin Falls Regional Office
Department of Environmental Quality
1363 Fillmore St.
Twin Falls, ID 83301

Phone: (208) 736-2190
Fax: (208) 736-2194

The Baghouse/Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the Baghouse/Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

2.10 Throughput Monitoring

To demonstrate compliance with the throughput limit, each month the permittee shall monitor and record the delivery of flyash in tons and total the delivered amount over the previous 12-calendar month period.

2.11 Operational Hours Records

To demonstrate compliance with the operational hours limits, the permittee shall monitor and record the hours of operation each day the facility is operating.

2.12 Fugitive Emissions Monitoring

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

The permittee shall monitor and maintain records of the frequency and the method(s) used (water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, any corrective action taken, and the date the corrective action was taken.

The permittee shall conduct a weekly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

2.13 Visible Emissions Monitoring

The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in

accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

2.14 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 58.01.01.211, 5/1/94]