

900 North Skyline, Suite B • Idaho Falls, Idaho 83402-1718 • (208) 528-2650

Dirk Kempthorne, Governor C. Stephen Allred, Director

Date: 03-05-2001

#### CERTIFIED MAIL # 70000520002348765298

Mr. James Rush Vice president Rocky Mountain Environmental 482 Constitution Way Idaho Falls, Idaho 83402-3537

RE:

P000535, Simmon's True Value Hardware, Roberts (Soil Vapor Treatment system, PTC No. 051-00018)

Dear: Mr. Rush

On January 31,2001, the Idaho Department of Environmental Quality (DEQ) received an application from Rocky Mountain Environmental for the construction of a soil vapor extraction system to treat petroleum contaminated soil in the city of Roberts. Rocky Mountain Environmental proposes the use of an electric catalytic oxidizer for the destruction of gaseous waste containing BTEX.On February 26, 2001 the application was determined complete.

Based on review of the application and all applicable state and federal rules and regulations, DEQ finds that this project meets the provisions of IDAPA 58.01.01.200 (Rules for the Control of Air Pollution in Idaho). Enclosed is PTC No. 051-00018 for the soil vapor treatment system.

This permit does not release the Permittee from compliance with all other applicable federal, state, local, or tribal laws, regulations, or ordinances. Please pay particular attention to the reporting requirements contained in Paragraph E of the General Provisions section of the permit. This information is needed to properly track the progress of the permit. Please refer to the appropriate permit number when submitting reports required in the Reporting Requirements section of the permit.

You are strongly encouraged to request a meeting with DEQ to discuss the permit terms and requirements with which your facility must comply. Mr. Jorge Garcia of the Idaho Falls Regional Office will contact you regarding this meeting. DEQ strongly recommends that in addition to your facility plant manager; your responsible official, environmental contact and any operations staff responsible for day-to-day compliance with permit conditions also attend the meeting.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 38706-1255, within thirty-five (35) days of the date of this decision. However, DEQ encourages you to contact the Air Quality Permit Program to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Rensay Owen or Jorge A. Garcia, at (208) 528-2650.

Sincerely, Renowy Unex for

James Johnston Administrator

Idaho falls Regional Office

**Enclosures** 

CC:

Idaho Falls Regional Office L. Kral, EPA - Region 10



#### Air Pollution PERMIT TO CONSTRUCT

State of Idaho Department of Environmental Quality **PERMIT NO.: 051-00018** 

AQCR: 061

CLASS: R

SIC:

5541

**ZONE: 12** 

**UTM COORDINATE (km):** 

#### 1. PERMITTEE

Rocky Mountain Environmental

#### 2. PROJECT

Soil Vapor Treatment - Simmons' True Value Hardware, Roberts, Idaho

MAILING ADDRESS     482 Constitution Way	CITY Idaho Falls	STATE Idaho	ZIP 83403
FACILITY CONTACT     James Rush	TITLE Operator	TELEPHONE (208) 524-2353	
RESPONSIBLE OFFICIAL     James Rush	TITLE Contractor	TELEPHONE (208) 524-2353	
6. EXACT PLANT LOCATION City of Roberts, Idaho		COUNTY Jefferson	

#### 7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Remediation of Petroleum Contaminated Soil

#### 8. GENERAL CONDITIONS

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 58.01.01.200, and pertains only to emissions of air contaminants that are regulated by the state of Idaho and to the sources specifically allowed to be constructed 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 Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees, assumes 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 is not transferable to another person, place, piece or set of 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 of design or equipment may require Department approval pursuant to the Rules for the Control of Air Pollution in Idaho. IDAPA 58.01.01.200, et.seq.

DISCLAIMER: This document may serve as a Preliminary Inspection Finding Form for use by Department personnel in communicating your compliance status upon inspection. It does not constitute a final determination of compliance status with the Idaho Code or any rules promulgated, permits issued, or consent or judicial orders entered into pursuant to the law. The Idaho Department of Environmental Quality reserves the right to supplement this document with additional compliance determinations, and amend, change, or otherwise modify any compliance determination stated in this document. This document in no way restricts the state of Idaho, Department of Environmental Quality from taking any action available under law to address past, present, or future violations of the laws administered by the agency.

ADMINISTRATOR, IDAHO FALLS RÉGIONAL OFFICE

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: March 5, 2001

#### AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 051-00018

Permittee: Rocky Mountain Environmental Location: CITY OF ROBERTS, IDAHO

IN DEQ Use Only INC

3.2

34

72

.

Location: CITY OF ROBERTS, IDAHO Date Issued: March 5, 2001

## SOURO = Soll Vapor inextinento Roberts

1. EMISSION LIMITS: Catalytic Oxidation System

#### 1.1 Catalytic Oxidation System

Benzene emissions from the soil vapor treatment discharge stack shall not exceed 0.05 lb/hr when the catalytic oxidation system is in operation.

#### 1.2 Opacity Limit

Emissions emanating from the soil vapor treatment stack, vent, or other functionally equivalent opening, shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required in IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined using the procedures contained in IDAPA 58.01.625.

#### 2. OPERATING REQUIREMENTS

#### 2.1 Catalytic Bed Monitoring Devices

The permittee shall install, calibrate, operate and maintain a temperature monitoring device and a pressure drop meter to continuously measure the temperature and pressure drop within the catalyst bed.

#### 2.2 Catalytic Bed Inlet Temperature

The catalyst bed inlet temperature shall be maintained above six hundred degrees Fahrenheit, at all times, during which contaminated soil vapor is being treated by the catalytic oxidation system.

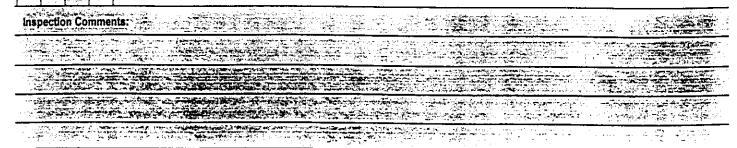
#### 2.3 Catalytic Bed Pressure

The pressure drop within the catalyst bed shall be maintained according to manufacturer's specifications at all times during soil vapor is being treated by the electric catalytic oxidizer to ensure 99% removal and destruction efficiency.

#### 3. MONITORING AND RECORD KEEPING REQUIREMENTS.

#### 3.1 Catalyst Bed Temperature and Pressure Drop

The Permittee shall monitor and retain daily records of the catalyst inlet temperature and pressure drop through the catalyst bed to demonstrate compliance with section 2.2 and 2.3 of this permit.



1/31/01

#### AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 051-00018

Permittee: Rocky Mountain Environmental

Location: CITY OF ROBERTS, IDAHO Date Issued: March 5, 2001

#### GENERAL PROVISIONS

### ☆ DEQ Use Only 7次 IN OUT PEND UNK ÷. × 2 \* \*\* C. presentation of credentials: 3.3 the Director. 115 ×2... 1

#### PERMIT TO CONSTRUCT GENERAL PROVISIONS

- 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 emission 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.
- 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.
- The Permittee shall allow the Director, and/or the authorized representative(s), upon the
- To enter at reasonable times upon the premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
- At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack emission testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by
- Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- The Permittee shall notify DEQ, in writing, of the required information for the following events within five (5) working days after occurrence:
- 1. Initiation of Construction - Date
- 2. Completion/Cessation of Construction - Date
- Actual Production Startup Date
- 4. Initial Date of Achieving Maximum Production Rate - Production Rate and Date
- If emission testing is specified, the Permittee must schedule such testing within sixty (60) days after achieving the maximum production rate, but not later than one hundred and eighty (180) days after initial startup. Such testing must strictly adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written DEQ

Inspection Comments:	e, 1 . 3 . 1
and the second of the second o	

1/31/01

7

ür.

. . .

ij'n.

#### AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 051-00018

Permittee: Rocky Mountain Environmental Location: C!TY OF ROBERTS, IDAHO

made available to DEQ upon request.

IN : OUT PEND UNK

71.0°

# CITY OF ROBERTS, IDAHO Parch 5, 2001 GENERAL PROVISIONS Amonth of the Issued: March 5, 2001

# approval. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least fifteen (15) days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be

The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by DEQ, unless (1) the test demonstrates noncompliance, (2) a more restrictive operating limit is specified elsewhere in this permit, or (3) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

G. 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.

Inspection Comments.

ો