



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR
TONI HARDESTY, DIRECTOR

August 4, 2006

Certified Mail No. 7005 1160 0000 1550 6391

Michael Gaudette
Univar USA Inc.
1804 N. 20th Street
Nampa, Idaho 83687

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

Dear Mr. Gaudette:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-060023 to Univar USA Inc. for a facility name change 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 June 1, 2006. This permit is effective immediately and replaces PTC 0020-0096, issued on August 24, 1998, the terms and conditions of which no longer apply. This permit does not release Univar USA Inc. 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 call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/SYC/bf

Permit No. P-060023

Enclosures

c: **Leonard Herr, Boise Regional Office**
 Bill Rogers, Permit Coordinator
 Shawnee Chen, P.E., Senior Engineer
 Marilyn Seymore/ Pat Rayne, Air Quality Division
 Laurie Krai, US EPA Region 10
 Permit Binder
 Source File
 Phyllis Heitman (Ltr Only)
 Reading File (Ltr Only)



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

PERMIT No.: P-060023
FACILITY ID No.: 001-00096
AQCR: 63 **CLASS:** B
SIC: 5619 **ZONE:** 12
UTM COORDINATE (km): 558.0, 4828.5

1. PERMITTEE
Univar USA Inc.

2. PROJECT
Permit to Construct for Air Stripping - Revision

3. MAILING ADDRESS 1804 N. 20 th Street	CITY Nampa	STATE ID	ZIP 83687
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4. FACILITY CONTACT Michael Gaudette	TITLE Senior Project Manager	TELEPHONE (208) 888-1094
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5. RESPONSIBLE OFFICIAL Michael Gaudette	TITLE Senior Project Manager	TELEPHONE (208) 888-1094
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6. EXACT PLANT LOCATION Pier 1 Imports, 140 Milwaukee, Boise Idaho 83704	COUNTY Ada
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7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Former location of Chemical Distribution Facility, Current Investigation/Remediation Site

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, 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 of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.



**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: August 4, 2006

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
ft/sec	feet per second
GC/MS	gas chromatography /mass spectrum
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
lb/yr	pound per year
OVM	organic vapor meter
PCE	Tetrachloroethylene, also known as perchloroethylene
PVC	PolyVinyl Chloride
RCRA	Resource Conservation and Recovery Act
SIC	Standard Industrial Classification
TSD	Transfer, Storage, and Disposal
Univar USA	Univar USA Inc.
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060023

Permittee:	Univar USA Inc.	Facility ID No. 001-00096	Date Issued:	August 4, 2006
Location:	Boise, Idaho			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This is a revision to the existing Permit to Construct (PTC). The permittee requested a company name change to the permit.
- 1.2 This PTC replaces PTC No. 0020-0096 issued on August 24, 1998, the terms and conditions of which no longer apply.
- 1.3 The following is a chronological history of the permits issued at this facility which are no longer in effect.
 - Original PTC issued November 22, 1991
 - Revised PTC issued August 24, 1998.

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
1	Air stripper with Ambersorb 563 adsorbers	none

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2. AIR STRIPPER WITH AMBERSORB 563 ADSORBERS

2.1 Process Description

2.1.1 Site Description

From approximately 1973 to 1983, Univar USA Inc. (Univar USA) operated a small chemical distribution facility from a portion of a warehouse located on Friedly Drive, Boise, Idaho. Univar USA reportedly stored PCE in an above-ground tank at this facility. Today, a Pier 1 Imports store occupies the general area where the warehouse, partially occupied by Univar USA, was located.

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

2.1.2 Air Stripper Control System Description

Univar USA 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 at 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.

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2.1.3 Stack Specifications

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

2.2 Emissions Control Description

None.

Emissions Limits

2.3 Emissions Limits

The emissions of Vinyl chloride, trans-1,2-dichloroethene, cis-1,2-dichloroethene, trichloroethylene, tetrachloroethylene, and ethylbenzene 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 EMISSIONS LIMITS

Source Description	Vinyl Chloride		trans-1,2-dichloroethene		cis-1, 2-dichloroethene		Trichloroethylene		Tetrachloroethylene		Ethylbenzene	
	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

Monitoring 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.

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.

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.

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.

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;

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Location:	Boise, Idaho			

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.

Operating Requirements

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

Reporting Requirements

- 2.10 Initial sampling of Section 2.5 shall be submitted to DEC 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.
- 2.11 The permittee shall submit to DEQ time and dates breakthrough is detected and time and dates of canister replacement.
- 2.12 The permittee shall submit ambient monitoring results of Sections 2.6 to DEQ within 14 days after ambient monitoring.
- 2.13 The permittee shall submit, for DEC approval, a quality control and quality assurance document in accordance with Section 2.5 and at least 30 days prior to initial sampling.
- 2.14 The permittee shall report in accordance with Sections 2.5.2 and 2.6.2 if analytical or monitoring results show higher concentrations than that submitted with the application.

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

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.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - 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 compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. 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.
5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
 - A notification of the date of initiation of construction, within five working days after occurrence;
 - A notification of the date of completion/cessation of construction, within five working days after occurrence;
 - 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;
 - 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
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.

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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.

7. 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.
8. In accordance with IDAPA 58.01.01.123, 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.