



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

February 15, 2008

Certified Mail No. 7190 0596 0014 0000 1942

Ray Cawthorne, Terminal Manager
Chemical Lime Company
1880 Tenmile Pass Road
Bancroft, Idaho 83217

RE: Facility ID No. 029-00028, Chemical Lime, Bancroft
Final Permit Letter

Dear Mr. Cawthorne:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0229 to Chemical Lime Company for the Railcar Load-out facility located near Bancroft, 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 December 7, 2007, and replaces PTC No. 029-00028, issued on July 6, 1999, the terms and conditions of which no longer apply. This permit does not release Chemical Lime Company 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 Dan Pitman at (208) 373-0502 or daniel.pitman@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\DP\hp

Project No. P-2007.0229

Enclosures

Chemical Lime Company, Bancroft
February 15, 2008
Page 2 of 2

HARD COPY TO FACILITY

en: Rick Elkins, AQ Compliance Officer, Pocatello Regional Office
Dan Pitman, Permit Writer
Marilyn Seymore/ Pat Rayne, AQ Division
Helen Price, Stationary Source Administrative Assistant

en-web: Laurie Kral, U.S. EPA Region 10

ec: Ray Cawthorne, Ray.Cawthorne@chemicallime.com
Herbert J. Verville, hverville@aecinc.org

c: Reading File (Ltr Only)
Source File
Permit Binder
Bill Rogers, Permit Coordinator (Ltr Only)
Phyllis Heitman, AQ Division (Ltr Only)



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

PERMIT No.: P-2007.0229
FACILITY ID No.: 029-00028
AQCR: 61
CLASS: B
SIC: 3274 **ZONE:** 12
UTM COORDINATE (km): 428.1, 4,729.7

1. PERMITTEE

Chemical Lime Company

2. PROJECT

Pneumatic Railcar Load-out

3. MAILING ADDRESS

P.O. Box 88

CITY

Bancroft

STATE

ID

ZIP

83217

4. FACILITY CONTACT

Ray Cawthorne

TITLE

Terminal Manager

TELEPHONE

209-982-4112

5. RESPONSIBLE OFFICIAL

Ray Cawthorne

TITLE

Terminal Manager

TELEPHONE

209-982-4112

6. EXACT PLANT LOCATION

1880 Tenmile Pass Road

COUNTY

Caribou

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Lime and Hydrate Truck and Railcar Load-out

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.

DAN PITMAN, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM
MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:

February 15, 2008

DATE ISSUED:

July 6, 1999

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
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
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0229

Permittee:	Chemical Lime Company
Location:	Bancroft, Idaho

Facility ID No. 029-00028

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 The purpose of this permit is to allow for pneumatic unloading of lime and hydrated lime and to require that emissions from pneumatic unloading are controlled by an existing baghouse.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
- 1.3 This PTC incorporates and replaces PTC No. 029-00028 issued on July 6, 1999.

Regulated Sources

- 1.4 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)
2	Conveyor Assisted Loading/Unloading of Lime and Hydrated Lime (See Table 2.1)	Enclosures and Baghouses
3	Pneumatic Railcar Unloading of Lime and Hydrated Lime	Baghouse

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2. CONVEYOR ASSISTED LIME/HYDRATED LIME LOADING & UNLOADING

2.1 Process Description

Lime is loaded into railcars from trucks using screw conveyors and bucket elevators; lime unloaded from trucks may also be stored in either a 40 ton storage bin or a 150 ton storage bin.

Lime and hydrated lime are unloaded from railcars to trucks using screw conveyors and belt conveyors.

2.2 Emissions Control

Table 2.1 LIME/HYDRATED LIME CONVEYOR ASSISTED LOADING/UNLOADING

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Truck Unloading Bay	Baghouse	DC-953
40 Ton Storage Bin	Baghouse	DC-953
Screw Conveyor (SC-1)	Enclosed/Baghouse	DC-953
Bucket Elevator (BE-956)	Baghouse	DC-953 (Elevator Feed); DC – 957 (Elevator Discharge)
150 Ton Storage Bin	Baghouse	DC-957
Screw Conveyor (SC-2)	Enclosed/Baghouse	DC-957
Bucket Elevator (BE-965)	Baghouse	DC-957
Screw Conveyor (SC-3)	Enclosed/Baghouse	DC-957
Belt Conveyor (BC-1)	Enclosed/Baghouse	DC-953 (Conveyor Discharge)
Screw Conveyor (SC-T)	Enclosed/Pneumatic Boot Lift Seal	Fugitive

Emissions Limits

2.3 Baghouse Emissions

Particulate matter with an aerodynamic diameter of equal to or less than a nominal 10 microns (PM-10) emissions from the baghouse stacks shall not exceed 0.035 pounds per hour (lb/hr).

2.4 Visible Emissions

Visible emissions from the baghouse stacks shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period in accordance with IDAPA 58.01.01.625 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined using the procedures specified in IDAPA 58.01.01.625.

2.5 Fugitive Emissions

Fugitive emissions from the load-out facility, traffic areas, stockpiles, and aggregate handling equipment shall be reasonably controlled as required in IDAPA 58.01.01.651.

Operating Requirements

2.6 Throughput Limits

Maximum lime throughput in the lime load-out facility shall not exceed twenty-seven thousand, seven hundred forty tons per month (27,740 T/mo.) or three hundred thirty-two thousand, eight hundred eighty tons per any consecutive 12-month period (332,880 T/yr).

2.7 Baghouse Maintenance

The permittee shall have developed an Operations and Maintenance (O&M) Manual for the baghouses (DC-953, DC-957) which describes the procedures that will be followed to comply with General

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Location:	Bancroft, Idaho

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Provision 2 and the air pollution control device requirements contained in this permit. The manual shall outline baghouse integrity checks at an interval not greater than one month. The manual shall remain on-site and shall be made available to DEQ representatives upon request.

2.8 Railcar Load-out Equipment

Emissions from the permanent railcar load-out equipment shall be vented through a baghouse.

Monitoring and Recordkeeping Requirements

2.9 Daily Throughput

Daily throughput of the lime load-out facility shall be monitored and recorded in a log. The log shall, at a minimum, include the date and throughput. Monitoring data for the most recent two (2) year period shall be maintained on-site and shall be made available to DEQ representatives upon request.

2.10 Monthly Throughput

Calculated throughput for the most recently completed month and for the most recent 12-month period shall be recorded in a log.

2.11 Baghouse Integrity

Results of monthly baghouse integrity checks, outlined by the O&M Manual described in Section 2.7 of this permit, shall be recorded in a log. The log shall remain on-site and shall be made available to DEQ representatives upon request.

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Location:	Bancroft, Idaho

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3. PNEUMATIC UNLOADING

3.1 Process Description

Lime and hydrated lime is unloaded from railcars to trucks using a truck mounted air blower.

[February 15, 2008]

3.2 Emissions Control Description

Emissions from pneumatic unloading of lime and hydrated lime shall be controlled by a baghouse.

Table 3.1 PNEUMATIC RAILCAR UNLOADING

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Railcar Unloading	Baghouse	DC-953

[February 15, 2008]

Operating Requirements

3.3 Pneumatic Unloading Of Lime And Hydrated Lime

Emissions from pneumatic unloading of lime and hydrated lime shall be controlled by a baghouse (DC-953). The baghouse shall be operated and maintained in accordance with Permit Condition 2.7.

[February 15, 2008]

3.4 Pneumatic and Conveying Operations

Pneumatic transfer of lime and hydrated lime from railcars to trucks shall be accomplished solely by a truck mounted blower.

[February 15, 2008]

Notification Requirements

3.5 The notification requirements of General Provision number 5 do not apply to this permit to construct revision.

[February 15, 2008]

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Location:	Bancroft, Idaho

Facility ID No. 029-00028

4. 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;

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- 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]

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Permittee: Chemical Lime Company

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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 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]