



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
John H. Tippetts, Director

February 26, 2016

Mike Schutz, Regional Manufacturing Manager
Hilex Poly Company LLC
540 W. Nez Perce Ave.
Jerome, ID 83338

RE: Facility ID No. 053-00011, Hilex Poly Company LLC, Jerome
Final Permit Letter

Dear Mr. Schutz:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2008.0168 Project 61615 to Hilex Poly Company LLC located at Jerome for the installation of new extruders, corona treaters, and baglines. 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 October 29, 2015 and on all relevant comments received on DEQ's proposed permit during the public comment period.

This permit is effective immediately and replaces PTC No. P-2008.0168, issued on March 6, 2009. This permit does not release Hilex Poly Company LLC 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 Twin Falls Regional Office, 650 Addison Ave. West, Suite 110, Twin Falls, ID 83301, Fax (208) 736-2194.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Regional Manager, at (208) 737-3889 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 Darrin Pampaian at (208) 373-0502 or darrin.pampaian@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is written in a cursive style with a large initial "M" and a long, sweeping underline.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\dp

Permit No. P-2008.0168 PROJ 61615

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Hilex Poly Company LLC
Permit Number P-2008.0168
Project ID 61615
Facility ID 053-00011
Facility Location 540 W. Nez Perce Ave.
Jerome, ID 83338

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 February 26, 2016



Darrin Pampaian, P.E., Permit Writer



Mike Simon, Stationary Source Manager

Contents

1 Permit Scope..... 3
2 Corona Treaters 4
3 General Provisions..... 6

1 Permit Scope

Purpose

- 1.1 This is a modified permit to construct (PTC) to authorize the installation of twelve new extruders, with twelve associated corona treaters, and six new bag machines, with three associated corona treaters.
- 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-2008.0168, issued on March 6, 2009.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Corona treaters: Manufacturer: Enercon and Pillar/Solo or equivalent* Model numbers: CS012SF-200/2 and P6000 Feed material: High density polyethylene Total installed corona treaters: 29	None

*Or equivalent is defined as all emissions factors, exhaust flowrates, and toxics emissions for the alternative corona treaters are less than or equal to the corona treaters specified in the permit.

[2/26/2016]

2 Corona Treaters

2.1 Process Description

Hilex Poly Company LLC manufactures plastic grocery bags. Polyethylene pellets are transferred from storage bins to extruders via a vacuum handling system. The extruders form the pellets into a tubular film which is then cooled and passed through a corona treater. A high voltage corona discharge ionizes the film surface to prepare it for printing. The film is wound into rolls and stored until needed for conversion into bags.

2.2 Control Device Descriptions

Table 2.1 Corona Treaters Description

Emissions Units / Processes	Control Devices	Emission Points
Corona treaters: Manufacturer: Enercon and Pillar/Solo or equivalent* Model numbers: CS012SF-200/2 and P6000 Feed material: High density polyethylene Total installed corona treaters: 29	None	STACK1 STACK2

*Or equivalent is defined as all emissions factors, exhaust flowrates, and toxics emissions for the alternative corona treaters are less than or equal to the corona treaters specified in the permit.

[2/26/2016]

Emission Limits

2.3 Emission Limits

The emissions from the corona treaters shall not exceed the following limits:

- Ozone emissions from all corona treaters combined shall not exceed 10.22 lb/hr.
- Ozone emissions from all corona treaters combined shall not exceed 44.8 tons per any consecutive 12-month period.

[2/26/2016]

2.4 Ozone Emissions Factor

The permittee shall use the equipment-specific emissions factor, 0.073 pounds ozone per hour per kilowatt (lb-O₃/hr/kW), to estimate ozone emissions.

2.5 Opacity Limit

Emissions from the corona treater stacks, or any other stack, vent, or functionally equivalent opening associated with the corona treaters, 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.

[2/26/2016]

Operating Requirements

2.6 Power Source Limit

The power supplied to all corona treaters combined shall not exceed 140 kilowatts.

[2/26/2016]

2.7 Ozone Treater Changes or Modifications

If the permittee changes or modifies any ozone treater in any way, the permittee shall obtain as soon as practicable a written assurance from the ozone treater manufacturer that the change or modification has not changed the ozone generation characteristics. The written assurance shall be submitted to DEQ within 10-days upon receipt.

If the manufacturer cannot or does not provide written assurance that the ozone generation characteristics have not changed as a result of any change or modification, the emission factor specified in the Ozone Emissions Factor permit condition shall be deemed invalid and the permittee shall conduct a performance test in accordance with IDAPA 58.01.01.157 as soon as practicable to measure ozone emissions to demonstrate compliance with the Emissions Limits permit condition.

[2/26/2016]

Monitoring and Recordkeeping Requirements

2.8 Power Source Monitoring

The permittee shall monitor and record the power supplied to each corona treater and calculate the worst-case highest power supplied to all of the corona treaters once per day, when operating, to demonstrate compliance with the Power Source Limit permit condition. Power shall be expressed as kilowatts (kW).

[2/26/2016]

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;

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

[IDAPA 58.01.01.211.03, 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 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 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]