



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1445 North Orchard • Boise, Idaho 83706 • (208) 373-0550
www.deq.idaho.gov

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

July 11, 2017

Don Ricci, Facility General Manager
Packaging Corporation of America
1808 East Chisholm Drive
Nampa, ID 83687

RE: Facility ID No., 027-00026, Project No. 61911, Packaging Corporation of America,
Nampa, Change of Facility Name by Permit to Construct Revision

Dear Mr. Ricci:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2010.0053 Project 61911 to Packaging Corporation of America located in Nampa for the facility name change from Boise Packaging & Newsprint, L.L.C. to Packaging Corporation of America. 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 received June 27, 2017. The facility name change modification is based on the following information:

Previous Permittee Information

Permittee:	Boise Packaging & Newsprint Corporation, L.L.C.
Mailing Address:	1808 Chisholm Drive, Nampa, ID, 83687
Facility Location:	1808 Chisholm Drive, Nampa, ID, 83687
Facility Contact::	Steve Henkle, Process Improvement Manager
Phone Number:	(208) 442-4135
E-mail Address:	stevehenke@packagingcorp.com
Responsible Official:	Dave Kunz, General Manager

Updated Permittee Information

Permittee:	Packaging Corporation of America
Mailing Address:	1808 Chisholm Drive, Nampa, ID, 83687
Facility Location:	1808 Chisholm Drive, Nampa, ID, 83687
Facility Contact::	Steve Henkle, Process Improvement Manager
Phone Number:	(208) 442-4155
E-mail Address:	stevehenke@packagingcorp.com
Responsible Official:	Don Ricci, General Manager

This permit is effective immediately and replaces PTC No. P-2010.0053, issued on June 7, 2010. This permit does not release Packaging Corporation of America from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Will Tiedemann, Permit Engineer in Training, at (208) 373-0283 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.

If you have any questions, please contact Will Tiedemann at 208.373.0283 or william.tiedemann@deq.idaho.gov.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon". The signature is written in a cursive, flowing style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/WT

Permit No. P-2010.0053 PROJ 61911

Air Quality

PERMIT TO CONSTRUCT

Permittee Packaging Corporation of America
Permit Number P-2010.0053
Project ID 61911
Facility ID 027-00026
Facility Location 1808 Chisholm Drive
Nampa, ID 83687

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 July 11, 2017



Will Tiedemann, Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is a revised permit to construct (PTC) to change the facility name from Boise Packaging & Newsprint, L.L.C. to Packaging Corporation of America.

[July 11, 2017]

1.2 This PTC replaces Permit to Construct P-2010.0053 issued June 7, 2010.

[July 11, 2017]

1.3 The emission sources regulated by this permit are listed in the following table.

Table 1.1 Regulated Sources

Source Descriptions	Emission Controls
Corrugator	None
Printing & Gluing	None
Starch Storage Silo	Baghouse
Scrap Cyclone	Cyclone & Baghouse

2 Facility-Wide Conditions

Fugitive Emissions

2.1 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.

- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly 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.

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:
 - a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) 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%, as measured using Method 9, 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 emission 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.

Open Burning

2.9 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning, IDAPA 58.01.01.600-623.

Reports and Certifications

2.10 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, 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. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise Idaho 83706
Phone: (208) 373-0550
Fax: (208) 373-0287

Obligation to Comply

2.11 Receiving a permit to construct shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

3 Corrugator

3.1 Process Description

The corrugator manufactures corrugated sheet material using single facers, a double-back glue unit, pre-heaters, and starch. Starch is stored on-site in the starch storage silo and is received by a pneumatic conveying system from either rail cars or trucks. The starch is transferred to the process building via an enclosed screw auger, or manually, when necessary. Scrap generated by corrugated stock production is collected by a pneumatic system with a cyclone and a baghouse.

3.2 Control Device Descriptions

Emissions from the starch storage silo are controlled by a baghouse. Emissions from the scrap container board cyclone are controlled by a baghouse. Emissions from the corrugator are uncontrolled.

Table 2 STARCH STORAGE SILO AND SCRAP CONTAINER BOARD CYCLONE DESCRIPTION

Emissions Unit/ Process	Emissions Control Device	Emissions Point
Starch Storage Silo	Baghouse	Baghouse Stack
Scrap Container Board Cyclone	Cyclone and Baghouse	Baghouse Stack

Emission Limits

3.3 VOC and PM₁₀ Emission Limits

The VOC and PM₁₀ emissions from the corrugator, starch silo, and scrap system shall not exceed any corresponding emissions rate limits listed in Table 3.

Table 3 CORRUGATOR AND BAGHOUSE EMISSIONS LIMITS^{a,d}

Source Description	VOC	PM ₁₀ ^b	
	T/yr ^c	lb/day	T/yr ^c
Corrugator	5.84	1.8	0.33
Starch Silo Baghouse	N/A	1.85	0.34
Scrap System Baghouse	N/A	2.56	0.22

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) 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.
- c) Tons per any consecutive 12-calendar month period.
- d) As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis

Operating Requirements

3.4 Throughput Requirement

The throughput of the container sheets of the corrugator shall not exceed 9.2 million square feet per day and 1.6 billion square feet per any consecutive 12-month period.

3.5 Start Silo Bag House Pressure Drop

The permittee shall maintain the pressure drop across the starch silo baghouse within manufacturer's specifications during periods of silo filling.

3.6 Scrap System Bag House Pressure Drop

The permittee shall maintain the pressure drop across the scrap system baghouse within manufacturer's specifications when the facility is in operation.

Monitoring and Recordkeeping Requirements

3.7 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, pressure drop monitoring equipment to continuously measure the pressure differential across the starch silo baghouse when it is operating, and continuously measure the pressure differential across the scrap system baghouse.

3.8 Start Silo Baghouse Pressure Drop Recording

The permittee shall record the pressure drop across the starch silo baghouse once during each silo filling.

3.9 Scrap System Baghouse Pressure Drop Recording

The permittee shall record the pressure drop across the scrap system baghouse once per day, when the system is in operation.

3.10 Throughput Monitoring

The permittee shall monitor and record the throughput of corrugated sheets produced daily and annually.

3.11 Visible Emissions Monitoring

The permittee shall monitor and record visible emissions in accordance with the facility-wide opacity permit condition.

3.12 Facility-Wide Recordkeeping

Records shall be maintained in accordance with the facility-wide recordkeeping permit condition.

4 Printing and Gluing

4.1 Process Description

The printing and gluing process uses flexographic printers, laminators, and a die cutter to print designs and letters on the container board, cut and form the container, and glue the container to customer specifications. Glue and ink may also be applied by hand.

4.2 Control Device Descriptions

The facility-wide emissions from the printing and gluing operations are uncontrolled.

Emission Limits

4.3 Emission Limits

VOC emissions from printing and gluing shall not exceed any corresponding emissions rate limits listed in Table 4.

Table 4 PRINTING AND GLUING EMISSIONS LIMITS

Source Description	VOC
	T/yr ^a
Printing and gluing	19

a) Tons per any consecutive 12-calendar month period.

Operating Requirements

4.4 Ink and Ink Additives and Glue Usage Throughput Limits

- Ink and ink additives usage shall not exceed 380,000 pounds per year, based on purchase records.
- Glue usage shall not exceed 1,500,000 pounds per year, based on purchase records.

4.5 Ink and Ink Additives and Glue VOC Content Limits

- The VOC content of ink and ink additives purchased during any consecutive 12-month period shall not exceed 8.0% by weight.
- The VOC content of glues purchased during any consecutive 12-month period shall not exceed 0.5% by weight.

Monitoring and Recordkeeping Requirements

4.6 Ink and Ink Additives Monitoring

The permittee shall monitor and record ink and ink additives usage in pounds each month. Annually, by February 1, the permittee shall calculate the total annual usage of ink and ink additives for the period from January 1 to December 31.

4.7 VOC content of Ink and Ink Additives Monitoring

The permittee shall monitor and record the VOC content of each ink and ink additive, expressed as percent by weight, each month. Monthly, the permittee shall calculate a weighted 12-month rolling average VOC content for total ink and ink additive usage.

4.8 Glue Monitoring

The permittee shall monitor and record glue usage in pounds each month. Annually, by February 1, the permittee shall calculate the total annual usage of glue for the period from January 1 to December 31.

4.9 VOC Content of Glue Monitoring

The permittee shall monitor and record the VOC content of glue, expressed as percent by weight, each month. Monthly, the permittee shall calculate a weighted 12-month rolling average VOC content for total glue usage.

4.10 General Provisions

Records shall be maintained in accordance with the recordkeeping permit condition in the General Provisions.

5 General Provisions

General Compliance

5.1 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.]

5.2 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]

5.3 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

- 5.4 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

- 5.5 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]

- 5.6 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

- 5.7 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.
- 5.8 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.
- 5.9 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 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

- 5.10 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

- 5.11 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

- 5.12 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

- 5.13 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

- 5.14 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

- 5.15 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

- 5.16 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]