

Statement of Basis

Final

**Packaging Corporation of America
Nampa, Idaho
Facility ID No. 027-00026
Permit to Construct No. P-2010.0053**

**July 11, 2017
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Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
FACILITY INFORMATION	4
Description	4
Permitting History	4
Application Scope	4
Application Chronology	4
TECHNICAL ANALYSIS	4
Emissions Units and Control Devices	4
Emissions Inventories	5
Ambient Air Quality Impact Analyses	5
REGULATORY ANALYSIS	5
Attainment Designation (40 CFR 81.313)	5
Permit to Construct (IDAPA 58.01.01.201).....	5
Tier II Operating Permit (IDAPA 58.01.01.401)	Error! Bookmark not defined.
Visible Emissions (IDAPA 58.01.01.625)	5
Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70).....	5
PSD Classification (40 CFR 52.21)	5
NSPS Applicability (40 CFR 60).....	6
NESHAP Applicability (40 CFR 61).....	6
MACT Applicability (40 CFR 63).....	6
Permit Conditions Review	6
summary of emission rate limits	6
PUBLIC REVIEW	6
Public Comment Opportunity	6
APPENDIX A – EMISSIONS INVENTORIES	
APPENDIX B – FACILITY DRAFT COMMENTS	
APPENDIX C – PROCESSING FEE	

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAP	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MMBtu/hr	million British thermal units per hour
NAAQS	National Ambient Air Quality Standard
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SO ₂	sulfur dioxide
T/yr	tons per consecutive 12-calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

FACILITY INFORMATION

Description

The facility utilizes paper, starch, and steam to manufacture corrugated sheet material. Steam is provided by two 13.69 MMBtu/hr natural gas-fired boilers. Starch is received and stored in a silo equipped with a baghouse to control dust emissions during material unloading. The process utilizes a corrugator equipped with single facers, a double-back glue unit, and pre-heaters. Corrugated stock is processed into containers in various processes that involve cutting, slotting, folding, gluing, and printing.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

July 7, 2017	Permit to Construct No. 027-00026 (A)
June 7, 2010	Tier II Operating Permit No. T2-040005 (S)
November 14, 2002	Permit to Construct No. 027-00026 (S)
September 10, 2002	Permit to Construct No. 027-00026 (S)
July 17, 2001	Permit to Construct No. 027-00026 (S)
July 21, 2000	Permit to Construct No. 027-00026 (S)
June 2, 2000	Permit to Construct No. 027-00026 (S)
May 5, 1995	Permit to Construct No. 027-00026 (S)
March 16, 1995	Permit to Construct No. 027-00026 (S)

Application Scope

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. This PTC replaces Permit to Construct P-2010.0053 issued June 7, 2010. Ownership, location, manufacturing processes, and regulatory applicability remain unchanged.

Application Chronology

June 27, 2017	DEQ received an application
June 30, 2017	PTC Draft sent for peer review
July 11, 2017	Final Permit Issued

TECHNICAL ANALYSIS

Emissions Units and Control Devices

Table 1 EMISSIONS UNIT AND CONTROL DEVICE INFORMATION

Source Description	Control Equipment Description
Corrugator	None
Printing & Gluing	None
Starch Storage Silo	Baghouse
Scrap Cyclone	Cyclone & Baghouse

Emissions Inventories

A detailed emissions inventory has been included in Appendix A. A brief summary of PM₁₀ and VOC emissions are given in Table 2.

Table 2 EMISSIONS INVENTORY

Source Description	VOC		PM ₁₀		Formaldehyde
	lb/day	T/yr	lb/day	T/yr	T/yr
Corrugator	67.2	5.84	1.8	0.33	N/A
Starch Silo Baghouse	N/A	N/A	1.85	0.34	N/A
Scrap System Baghouse	N/A	N/A	2.56	0.22	N/A
Printing and Gluing	N/A	19	N/A	N/A	0.13

Total formaldehyde emissions from printing and gluing were estimated to be 0.13 T/yr.

Ambient Air Quality Impact Analyses

No air dispersion modeling was required with this permit revision because there is no change in emissions.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Canyon County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The application was submitted for a facility name change requiring a PTC revision per IDAPA 58.01.01.209.04.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 Visible Emissions

The sources of PM₁₀ emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.7 and 2.8.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM₁₀, SO₂, NO_x, CO, VOC, and HAP or 10 tons per year for any one HAP or 25 tons per year for all HAPs combined as demonstrated in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006.113 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The permitting action does not include any units that are subject to NSPS requirements. The facility has two natural-gas fired boilers that were installed separately from any other permitting action and were and still are exempt from obtaining a permit to construct. The boilers are subject to 40 CFR 60 Subpart Dc requirements, but are not subject to a permit to construct. The Subpart Dc requirements are to monitor and record the natural gas usage on a monthly basis for each boiler.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

The facility is not subject to any MACT standards in 40 CFR Part 63.

Permit Conditions Review

This section describes only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

PTC permit condition numbering, formatting, and nomenclature were updated.

Removed Summary of Emission Rate Limits as listed on page 11 of June 7, 2010 PTC.

SUMMARY OF EMISSION RATE LIMITS

Table 5 EMISSION LIMITS

Source Description	VOC ^a	PM ₁₀ ^{a,b}	
	T/yr	lb/day	T/yr
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
Printing and Gluing	19	N/A	N/A

^aAs 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.

^b Includes condensibles

This section was considered duplicative of limits stated elsewhere in the permit and was removed.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.