

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) INITIAL ISSUANCE

Permit #:	04514	Company:	Poly-America, L.P.
Project #:	35800	Site:	Poly-America
Regulated Entity #:	RN100641752	Application Area:	Poly-America, L.P.
Region:	4	Customer #:	CN602612517
NAICS Code:	326113	County:	Dallas
Permit Reviewer:	Rick Goertz, P.E.	NAICS Name:	Unsupported Plastics Film and Sheet (except Packaging) Manufacturing

SITE INFORMATION

Physical Location: 2000 W Marshall Dr
Nearest City: Grand Prairie
Major Pollutants: VOC
Additional FOPs: None

PROJECT SUMMARY

Poly-America, L.P.'s Grand Prairie site is an Unsupported Plastics Film and Sheet (except Packaging) Manufacturing plant and a major source of emissions. It is subject to 30 TAC Chapter 122 which requires it to apply and obtain a Federal Operating Permit (FOP). The initial issuance application was received by TCEQ on October 18, 2023. Some of the significant emission sources at the site include silos, heaters, ovens, cooling towers, and printing/painting processes. The emission sources are subject to State and/or Federal regulations. An abbreviated application was received on October 18, 2023. The full application was received on December 7, 2023. The FOP includes general and special terms and conditions and unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-ACPS, OP-SUM, OP-REQ1, OP-REQ2, OP-PBRSUP, OP-1, OP-CRO1, and various Unit Attribute forms).

This project was transferred from the first permit reviewer to the current permit reviewer on April 17, 2024.

PROCESS DESCRIPTION

Poly-America produces extruded polyethylene film products from pelletized polyethylene resins. The feed pellets are received in railcars and are pneumatically conveyed to storage bins. From the storage bins, the pellets are pneumatically conveyed to individual extruder feed bins. The extruder is a large continuously revolving screw encased in a long heating chamber that carries the heated resin down the length of the screw toward a die (orifice) at the end of the chamber. Inside each extruder, the resin is melted, sheared, and mixed. The melted resin exits the extruder through a circular die and air is blown in the center to form a hollow, vertical column. As the plastic film column rises, it cools and the column is pinched and flattened through rollers at the top of the column. The film thus produced is wound on rolls and either transferred to bag machines or stored for later processing. The exhaust of extruders processing scented raw material is directed to one of two natural gas fired recuperative catalytic oxidizers (RCOs) for control of VOC, particulate matter and small amounts of hazardous air pollutants (HAPs).

Bag machines cut the polyethylene film to predetermined dimensions and apply a heat press to form the polyethylene film into its final shape as a bag.

Polyethylene scrap generated from production is recovered and processed to produce additional raw material for the process. Scrap polyethylene is shredded and fed to reprocessing extruders which are capable of producing polyethylene pellets from the scrap. The polyethylene pellets are then transferred to storage and eventually reintroduced to the polyethylene extrusion process

TECHNICAL REVIEW

Permit Content Summary

1. Was Periodic Monitoring (PM) required and included in the permit?..... Yes
2. Was Compliance Assurance Monitoring (CAM) required and included in the permit?..... No
3. Was case-by-case PM or CAM included in the permit?..... No

4. Was a permit shield requested?..... Yes
5. If a permit shield was requested, was any permit shield request denied?..... No
6. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements..... No
 - (b) Customized Special Terms and Conditions..... Yes
 - (c) Manual changes to the IMS-generated applicable requirements..... No
 - (d) Alternate means of compliance for any emission unit/source at the site..... No
7. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?..... No
8. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... No
9. Will the draft permit be sent to public notice with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

1. Group IDs GRPOVEN and GRPSILO: The units were subject to periodic monitoring associated with the requirements of 30 TAC 111 for visible emissions (Index number R111). The applicant chose periodic monitoring option No. PM-P-001 for both groups. Though option PM-P-001 was chosen, replacement option PM-P-032 was selected for the permit. The option has the applicant monitoring for visible emissions on a quarterly basis, if visible emissions are identified, the applicant has the option of reporting a deviation or monitoring for opacity. Provided the opacity does not exceed the corresponding opacity limit associated with the particulate matter standard in the underlying applicable requirement, no deviation has occurred. The deviation limit is noted as opacity greater than 20%.
2. OP-REQ2 items were reviewed for applicability and approved for permit shields.
3. Permit Term 6 (IMS term B.142) was customized to identify the current project number and submittal date on Form OP-PBR SUP.

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP. A Statement of Basis was prepared for this project and is included in the permit file.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on May 7, 2024.
 Site rating: 14.45 / Satisfactory Company rating: 9.03 / Satisfactory
 (High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
2. Has the permit changed on the basis of the compliance history or site/company rating?..... No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?..... No
2. Is a compliance plan and schedule included in the permit?..... No

Delinquent Fee Check

1. The delinquent fee check was performed on July 26, 2024.
2. Were there any delinquent fees owed? No

Public Notice Information

1. Were comments received from the applicant after the draft permit was mailed and before Public Notice was published?..... No
2. Was a revised draft permit or public notice authorization package (PN-Errata) sent for any reason?..... No
3. Publication date: September 4, 2024 Newspaper name: Classified Marketplace
4. Was bilingual public notice published?..... Yes
 Publication date: September 4, 2024 Newspaper name: Al Dia
5. Were comments received during Public Notice period?..... No
 - (a) Was a public hearing requested?..... No
 - (b) Was a public hearing held?..... No
 - (c) Was the public hearing request withdrawn?..... No
 - (d) Was permit content changed as a result of any public comments?..... No
6. Was re-publication necessary?..... No

Permit reviewer notes:

CID was reviewed on 10/08/2024 to make sure no comments from the public were received.

EPA Review

1. Did EPA comment on the draft permit?..... No
2. Was a separate NOPP - Notice of Proposed Permit sent to the EPA?..... No
If yes, did the EPA comment on the proposed permit?..... No
3. Were any changes made to the permit after the EPA Review Period?..... No
If yes, were these changes made within the 60 day Public Petition Period?..... No

Permit reviewer notes:

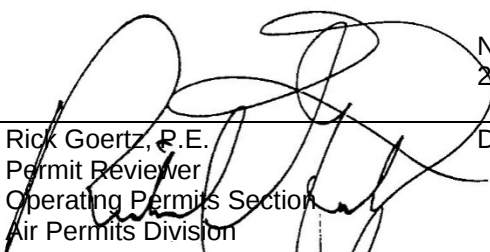
CID was reviewed on 11/5/2024 to make sure no comments from the EPA were received

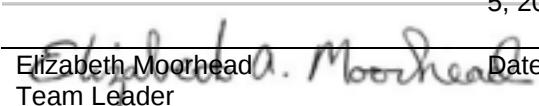
IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	10/18/2023	
Date Project Received by Engineer 1	11/03/2023	
Date Full Application Received by TCEQ	12/07/2023	
Date Project Received by Engineer 2	04/17/2024	
Technical Review Period	04/29/2024	07/26/2024
Working Draft Permit Reviewed by Applicant	06/07/2024	07/26/2024
Date PNAP/Draft Permit Mailed	08/23/2024	
Public Notice Comment Period	09/04/2024	10/03/2024
EPA Review Period	09/17/2024	11/01/2024
Date Sign Posting Certification Received	10/29/2024	

Milestone (Optional)	Start Date	End Date
Deficiency Cycle 1	05/06/2024	
Deficiency Cycle 2		
Request for Comments on Compliance Plan		
Date Comment on Draft Permit Received from Public		
Date comment on Draft Permit Received from EPA		
Date Public Hearing Requested		
Date Public Hearing Held		

EFFECTIVE PERMIT ISSUANCE DATE: November 14, 2024


November 5, 2024
Date
Rick Goertz, P.E.
Permit Reviewer
Operating Permits Section
Air Permits Division

November 5, 2024
Date

Elizabeth Moorhead
Team Leader
Operating Permits Section
Air Permit Division

CONTACT INFORMATION

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