

**SIP CONSTRUCTION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW**

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Facility Name: **Kimberly-Clark, LaGrange Mill**

City: LaGrange

County: Troup

AIRS #: 04-13-285-00048

Application #: 11639

Date SIP Application Received: August 20, 1999

Date Title V Application Received: September 27, 1999

Permit No: 2297-285-0048-V-01-1

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
<b>SSPP</b>	Heather Abrams	Sam Buckles
<b>SSCP</b>		Lou Musgrove
<b>ISMP</b>	George Garten	Richard Taylor
<b>TOXICS</b>	NA	NA

**Introduction**

This narrative is being provided to assist the reader in understanding the content of the attached SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

**I. Facility Description**

A. Existing Permits

**Table 1: Current Title V Permit and Amendments**

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2297-285-0048-V-01-0	July 09, 1998		x

B. Regulatory Status

1. PSD/NSR

There is no change in the facility's status regarding PSD/NSR.

2. Title V Major Source Status by Pollutant

**Table 3: Title V Major Source Status**

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	y			y
PM <sub>10</sub>	y			y
SO <sub>2</sub>	y			y
VOC	y	y		
NO <sub>x</sub>	y			y
CO	y			y
TRS	na			
H <sub>2</sub> S	na			
Individual HAP	y			y
Total HAPs	y			y

**II. Proposed Modification**

**A. Description of Modification**

The facility is modifying process lines SMS I, II and III. Line SMS I will be modified by replacing the existing extruder screws on Emission Unit LG1. This will increase the machine throughput rate from a max of 6100 to 7050 pounds polymer/hour. The average throughput will increase from 4761 to approximately 5635 pounds polymer/hour. Line SMS II will be modified in the same fashion with the throughput increasing from 6150 to 7050 pounds polymer/hour (average increase from 5060 to 5400 pounds polymer per hour). In addition, the SB Bank No. 1 and 2 fume exhaust will be split (2 fans per bank vs. 1 fan per bank). The existing fans are rated at 12,000 cfm per bank. The new fans will be rated at 6,000 cfm each still giving each bank a total of 12,000 cfm from the fans. There is no increase anticipated with the change in fans. Line SMS III will be modified like SMS II. The throughput will increase from 6800 to 7900 pounds polymer/hour (average increase 5250 to 6600 pounds polymer/hour).

**B. Emissions Change**

**Table 4: Emissions Change Due to Modification**

<b>Pollutant</b>	<b>Is the Pollutant Emitted?</b>	<b>Net Actual Emissions Increase (Decrease) (tpy)</b>	<b>Net Potential Emissions Increase (Decrease) (tpy)</b>
PM	y	12.82	
PM <sub>10</sub>	y	11.08	
SO <sub>2</sub>	y	0.04	
VOC	y	17.0	
NO <sub>x</sub>	y	13.9	
CO	y	0.68	
TRS	na	0	
H <sub>2</sub> S	na	0	
Individual HAP	y	See Application	
Total HAPs	y	4.72	

**C. PSD/NSR Applicability**

Since the emission increases are not above the PSD significant levels nor are they above the levels outlined in Georgia Rule 391-3-1-.03(8)c(14) for enhanced PSD, there are no issues regarding this modification.

**III. Facility Wide Requirements**

There is no change from the existing permit.

**IV. Regulated Equipment Requirements**

There are no changes from the existing permit.

**V. Testing Requirements** (with Associated Record Keeping and Reporting)

There are no changes to the existing permit.

**VI. Monitoring Requirements** (with Associated Record Keeping and Reporting)

There are no changes to the existing permit.

**VI. Other Record Keeping and Reporting Requirements**

There are no changes to the existing permit.

**VII. Specific Requirements**

A. Operational Flexibility

Not Applicable

B. Alternative Requirements

Not Applicable

C. Insignificant Activities

Not Applicable

D. Temporary Sources

Not Applicable

E. Short-Term Activities

Not Applicable

F. Compliance Schedule/Progress Reports

Not Applicable

G. Emissions Trading

Not Applicable

H. Acid Rain Requirements

Not Applicable

I. Prevention of Accidental Releases

Not Applicable

J. Stratospheric Ozone Protection Requirements

Not Applicable

K. Pollution Prevention

Not Applicable

L. Specific Conditions

Not Applicable

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2297-285-

**Closing Block:** We have reviewed and recommend issuance of draft/proposed Permit No. 0048-V-01-1

Program	Review Engineers	Dates	Review Managers	Dates
SSPP/ASU				
SSCP/ASU				
ISMP				
TOXICS				

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**Stationary Source Permitting Program Manager**

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Date

**ADDENDUM**

The permit was to be for lines SMS I, SMS II and SMS III. The cover page of the permit did not include SMS II. The permit cover page has been corrected and the permit amendment will be reissued.