

SIP CONSTRUCTION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

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

City: LaGrange

County: Troup

AIRS #: 04-13-285-00048

Application #: TV-12377

Date SIP Application Received: July 6, 2000

Date Title V Application Received: July 6, 2000

Permit No: 2297-285-0048-V-01-3

Program	Review Engineers	Review Managers
SSPP	Wendy Troemel	Sam Buckles
SSCP	Denis Kler	Lou Musgrove
ISMP	Sid Stephens	Richard Taylor
TOXICS		

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 below lists the current Title V permit, and all administrative amendments and minor and significant modifications to that permit. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2297-285-0048-V-01-0	July 9, 1998		X
2297-285-0048-V-01-1	November 3, 1999	X	
2297-285-0048-V-01-2	January 24, 2000		X

Table 2: Comments on Specific Permits

Permit Number	Comments
2297-285-0048-V-01-1	This amendment was revoked by 2297-285-0048-V-01-2
2297-285-0048-V-01-2	Significant modification for the replacement of gear boxes on lines SMS I, SMS II, and SMS III, which increased production and emissions

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	Yes			Yes
PM ₁₀	Yes			Yes
SO ₂	Yes			Yes
VOC	Yes	Yes		
NO _x	Yes			Yes
CO	Yes			Yes
TRS	N/A			
H ₂ S	N/A			
Individual HAP	Yes			Yes
Total HAPs	Yes			Yes

II. Proposed Modification

A. Description of Modification

The facility is constructing a new unit process to manufacture non-woven fabrics for use in disposable diapers. The process is a vertical flow SPU-bonded laminate (VFL) process. Purchased polymer pellets are melted in an extruder and pumped to a spinning system from which the polymer is cooled by chilled rolls. The cooled filaments are laminated between two layers of non-woven fabric (fed from an unwind system) coated with hot melt adhesive. The resulting bonded fabric is wound into rolls and shipped for further processing. New equipment include a filament extruder (Source Code: MB41) and an adhesive system (Source Code: AS41). Both pieces of equipment are grouped together in the VFL Process (Source Code: LG04). Maximum combined input of thermoplastic rubber and hot melt adhesive is 13,578 tons/year. The adhesive system and the filament extruder system will each have two fume exhaust stacks, and the entire process will have an additional seven roof ventilation fans.

The modification has been classified as a significant modification since the increase in emissions exceed 5 tons/year.

The modification will not effect any existing units and processes.

B. Emissions Change

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	No		
PM ₁₀	No		
SO ₂	No		
VOC	Yes	21.28	
NO _x	No		
CO	No		
TRS	No		
H ₂ S	No		
Individual HAP	No		
Total HAPs	No		

C. PSD/NSR Applicability

Although the potential VOC emissions from the facility exceed 250 tons/year, the emissions increase associated with this modification is not above the PSD significant levels. The facility has indicated that they can comply with the 250 tons/year limit set forth in their Permit; therefore, there are no issues regarding this modification.

III. Facility Wide Requirements

There are no changes from the existing permit.

IV. Regulated Equipment Requirements

There are no permit condition changes from the existing permit. The Emissions Units table 3.1 was updated to include process LG4 and to make some minor corrections. Sources WKT1, WKT2, and DST1 were mentioned in Conditions 3.2.2 and 6.2.2, but these were not listed as applicable in the table. Also, sources SMS I, SMS II, and SMS III did not list Condition 6.2.3 as applicable in the table.

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

There are no changes from the existing permit.

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

There are no changes from the existing permit.

VI. Other Record Keeping and Reporting Requirements

Since the new VFL process is very similar to the other three SMS processes, the VOC emissions can be calculated in the manner as dictated by Section 6.2. The facility has indicated that they can continue to comply with the 250 tons per year VOC emissions limit set by Condition 2.1.1

Condition 6.2.2 was modified to include the VFL process (Source Code: LG4), as well as to include the source codes for SMS I, SMS II, SMS III, and the web treater coating operations for clarification (Source Codes: LG1-3, WKT1, WKT2, and DST1). Also, Condition 2.2.1 was included in the list of Conditions that set forth VOC emission limits for the facility.

Condition 6.2.3 was modified to include the VFL process (Source Code: LG4) for the 12-month rolling total VOC emissions. Also, source codes for SMS I, SMS II, SMS III, and the web treater coating operations were added for clarification (Source Codes: LG1-3, WKT1, WKT2, and DST1).

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

SIP CONSTRUCTION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

2297-285-

Closing Block: We have reviewed and recommend issuance of draft/proposed Permit No. 0048-V-01-3

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

Stationary Source Permitting Program Manager

Date