

**TITLE V PERMIT STATEMENT**  
**(Proposed Minor Modification #2)**  
**Addendum #4**

<b>Facility Name: Hood Container Corporation</b>
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<b>City: New Johnsonville</b>
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<b>County: Humphreys</b>
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<b>Date Application Received: September 24, 2018</b>
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<b>Date Application Deemed Complete: September 24, 2108</b>
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<b>Emission Source Reference No.: 43-0010</b>
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<b>Permit No.: 575065</b>
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**INTRODUCTION**

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to ***Hood Container Corporation*** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. 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 process will be described in an addendum to this narrative.

**Acronyms**

PSD - Prevention of Significant Deterioration

NESHAP - National Emission Standards for Hazardous Air Pollutants  
 NSPS - New Source Performance Standards  
 MACT - Maximum Achievable Control Technology  
 NSR - New Source Review  
 GHG - Green House Gases

## **I. Identification Information**

### **A. Source Description**

List and describe emission source(s): Processes/fuel burning operations at Hood Container Corporation for manufacturing of corrugated paper media include:

43-0010-02: Package/backup boilers #2 & #3-Natural gas/No. 2 fuel oil, 192 MM BTU/hr each, backup for wood refuse boiler and combustion of LVHC gases  
 43-0010-07: 527 MM BTU/hr boiler burning wood refuse, ammonium sulfite spent liquor, sludge, OCC rejects, facility waste oil, natural gas/No. 2 fuel oil and combusting LVHC gases with venturi scrubber and tray absorption scrubber control  
 43-0010-08: Cooking liquor preparation with wet scrubber  
 43-0010-10: Paper machine and associated operations  
 43-0010-11: Pulp mill operations including blow tank and associated equipment:  
 43-0010-12: Wastewater treatment plant  
 43-0010-13: Secondary Fiber Recycle Pulp Mill

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### **B. Facility Classification**

#### **1. Attainment or Non-Attainment Area Location**

Area **is** designated as an attainment area for all criteria pollutants.

#### **2. Company **is** located in a Class II area.**

### **C. Regulatory Status**

#### **1. PSD/NSR**

This facility **is** a major source under PSD for particulate matter (PM).

#### **2. Title V Major Source Status by Pollutant**

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	<b>YES</b>	<b>YES</b>	
PM <sub>10</sub>			
SO <sub>2</sub>	<b>YES</b>	<b>YES</b>	
VOC	<b>YES</b>	<b>YES</b>	
NO <sub>x</sub>	<b>YES</b>	<b>YES</b>	
CO	<b>YES</b>	<b>YES</b>	

Individual HAP	<b>YES</b>	<b>YES</b>	
Total HAPs	<b>YES</b>	<b>YES</b>	
GHG	<b>YES</b>	<b>YES</b>	

### 3. MACT Standards

This facility **is** a major source for HAPs. This facility **is** subject to three final MACT Standards.

List MACT Rule(s) if applicable:

- a. Subpart S for pulp and paper industry for semi-chemical pulping processes.
- b. Subpart DDDDD for industrial, commercial and institutional boilers and process heaters
- c. Subpart ZZZZ for Reciprocating Internal Combustion Engine (RICE) (insignificant sources).

### 4. Program Applicability

Are the following programs applicable to the facility?

PSD **yes**

NESHAP (**yes, see above MACT standard Subpart S, Subpart DDDDD, and Subpart ZZZZ**)

NSPS (**yes**) 40 CFR 60 Subpart D for fossil fuel-fired units when burning fossil fuel or wood-fossil fuel mixture for wood refuse boiler (Source 07)

## II. Compliance Information

### A. Compliance Status

Is the facility currently in compliance with all applicable requirements? (**yes**)  
If no, explain.

Are there any applicable requirements that will become effective during the permit term? (**no**).

## III. Other Requirements

### A. Emissions Trading

The facility is not involved in an emission trading program.

### B. Acid Rain Requirements

This facility is not subject to any requirements in Title IV of the Clean Air Act.

### C. Prevention of Accidental Releases

This facility will report accidental releases to EPA Region IV and to the Tennessee Division of Air Pollution Control and annually certify compliance with their accidental release plan.

D. Greenhouse Gases (GHG) Emissions

This facility is a major source of GHG emissions

**IV. Public Participation Procedures**

Notification of this draft permit was mailed to the following environmental agencies:

- A. Environmental Protection Agency Region IV
- B. Kentucky Department for Environmental Protection, Air Pollution Control

**V. Project Description**

Title V Operating Permit No. 560438 represents the first renewal of the initial Title V Operating Permit No. 548424 issued May 9, 2002.

Facility Emissions

Pollutant	Maximum Allowable Emissions (ton/year)	Actual Emissions (ton/year)
Particulate (TSP)	93.64	
Sulfur Dioxide	576.45	
Volatile Organic Compounds	400.06	
Nitrogen Oxides	863.9	
VOC HAPs	46.35	
PM HAPs	5.5	

**VI. Permitting Activities Starting with Permit 545424**

The following changes (modifications) have occurred since the initial Title V operating permit was issued.

- A. Minor Modification 1 on July 18, 2011. This modification involves the repair of the wood refuse boiler economizer and superheater sections and the installation of a replacement attemperator with associated condensed water tank and the modification of the paper machine by the addition of thermo-compressor heat recovery loops for energy conservation, improvements to the threading operation for reduction of start-up time,

and adding cleaning showers to the 2nd dryer section along with table modifications to reduce the amount of downtime in the machine

- B. Administrative Amendment 2 on December 18, 2008. This Administrative Amendment incorporates the requirements from PSD Construction Permit Number 961563P into the Title V operating permit.
- C. Significant Modification 1 on May 9, 2006. This modification involves upgrades to the paper machine and new secondary fiber recycle pulp mill equipment. This reflects the final PSD construction permit #958331P that was issued on April 21, 2006.
- D. Administrative Amendment 1 on January 28, 2004. This administrative amendment specifies the minimum limits for acceptable control equipment operation, which are to be recorded during daily operation of the wood refuse boiler and the cooking liquor preparation. This is considered an administrative amendment pursuant to 1200-03-09-.02(11)(f)4(i)(II) of Tennessee Air Pollution Control Regulations because more frequent monitoring and reporting is required and specified. Permit conditions E5-1 and E6-1 are the affected permit conditions. This involves the scrubbers serving both operations.

#### **VII. Title V Permit 560438 Addendums**

- A. Title V 560438 issued April 1, 2014.
- B. Operational Flexibility #1 was issued April 10, 2014 to add a 600 tons per day Center Disc Thickener and accompanying equipment as part of the Secondary fiber Recycle Pulp Mill
- C. This is a minor permit modification to the Title V Permit 560438, as stated under 1200-03-09-.02(11)(f) 5 (ii) of the Tennessee Air Pollution Control Regulations. This is not a modification under Title I of the Federal Act. The following brief description outlines the changes/modification to the conditions are modified for this modification. On July 16, 2015 Hood Container Corporation applied for minor modification #1 to their Title V air Emissions Permit consisting of the following changes to the permit. Clarify that the facility does not have to comply with the wet electrostatic precipitator permit requirements until January 31, 2017 and shall follow the requirements for the existing equipment until the WESP is installed. Permit condition E5-1(MM1). Additionally the reporting of Sulfur Dioxide Monitoring emissions data in condition E5-8(MM1) was changed from a separate quarterly report to a part the semiannual report.

Minor Modification #1 was issued on November 16, 2015.

- D. Operational Flexibility #2 issued December 21, 2016 to upgrade the 160 pound steam supply line to the Paper Machine (Source ID: 43-0010-10; Facility ID: 4000P). The scope of this project includes the addition of a larger diameter supply line, as well as upgrading the sectional steam pressure control instrumentation.

- E. Significant permit modification #1 application to the Title V Permit 560438 received February 2, 2016. This modification is to restrict the use of fuel oil for the package boilers #2 and #3 at source 02 to periods of natural gas curtailment.

Significant Modification #1 was issued on January 30, 2017.

- F. Operational Flexibility #3 issued June 4, 2018 to allow changes proposed to the paper machine dryer from the current maximum allowable working pressure (MAWP) of 150 psi to approximately 158 psi MAWP.
- G. Operational Flexibility #4 issued August 22, 2018 to replace fuel oil burner #3 in the Refuse Boiler. The proposed changes will not affect the capacity of Refuse Boiler or increase the Mill's production.
- H. This is a minor permit modification to the Title V Permit 560438, as stated under 1200-03-09-.02(11) (f) 5 (ii) of the Tennessee Air Pollution Control Regulations. This is not a modification under Title I of the Federal Act. The following brief description outlines the changes/modification to the conditions that are modified for this modification. On September 12, 2018, Hood Container Corporation applied for minor modification #2 to their Title V air Emissions Permit. This modification is to add an emergency generator for a 413 horsepower (hp) River water fire pump and a 113 hp emergency fire water pump. Condition D14 was added to the permit to address the emergency engines. Conditions D11-D14 were added to update the permit shell. Conditions A8, A16, B5, B6, and B10,

Title V 575065 issued May 22, 2020, 2020. No Changes requested by permittee. Permit conditions were updated by Division as appropriate with the addition of 40 CFR subpart DDDDD rules.

**ADDENDUM TO TITLE V PERMIT STATEMENT: PUBLIC COMMENTS**

<b>Facility Name:</b>	<b>Hood Container Corporation</b>
<b>City:</b>	<b>New Johnsonville</b>
<b>County:</b>	<b>Humphrey</b>

<b>Date Application Received:</b>	<b>September 24, 2018</b>
<b>Date Application Deemed Complete:</b>	<b>September 24, 2018</b>

<b>Emission Source Reference No.:</b>	<b>43-0010</b>
<b>Permit No.:</b>	<b>575065</b>

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<b>Date of Public Notice:</b>	<b>April 1, 2020</b>
<b>Date of Public Hearing:</b>	<b>None Requested</b>

**Comment Summary**

The public notice for this renewal permit published in the Humphreys County “*News Democrat*”. No comments were received during the comment period.

**VIII. Title V Permit 575065 Addendums**

- A. Permit was issued 5-22-2020.
- B. Administrative Amendment 1 was issued May 5, 2021, to correct typographical errors in condition E5-1 related to the installation of the WESP and the applicability of Subpart DDDDD, and updated operating parameter limits, and errors in E1, E2, and several requirements in condition E3-1 through E3-4 and E3-8. Conditions E3-10, E3-11, E3-20, E4-6, E5-1, E5-16, E5-17, E7-3, E7-4, and E8-4 the language was also updated. Condition E3-21 was moved to E2d. Compliance methods in conditions E5-16 and E5-17 were updated. Condition E1 was updated to update fee emissions summary table. Tables in attachments 3 and 4 updated. Date was updated in condition E3-10.
- C. Administrative Amendment 2 was issued March 2, 2022, to correct typographical errors and ensure fee table is correct. Condition E2, E5-1, E5-11, E5-16, and E7-1 were updated.
- D. Minor Modification 1 was issued December 4, 2024, to update operation permit limit changes. Made some updates in general conditions due to changes in rules. Updated conditions B7, E1, E3-20, E5-1 and E3-20. Notification was sent to the EPA on October 7<sup>th</sup> for their 45 day review and there was no response.
- E. Minor Modification 2 was issued TBD, 2025 to update condition E5-1(MM2) for source testing. Added E4-13 to add language to account for the temporary boiler. Update E1 based on fee audit resolution.