

Facility Name: **Irving Consumer Products, Inc. – Macon**  
City: Macon  
County: Bibb  
AIRS #: 04-13-021-00237

Application #: TV-682182  
Date Application Received: July 29, 2022  
Permit No: 2621-021-0237-V-03-0

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## Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It 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. Facility Identification**

1. Facility Name: Irving Consumer Products, Inc. – Macon
2. Parent/Holding Company Name: Irving Consumer Products, Inc.
3. Previous and/or Other Name(s): None.
4. Facility Location

1897 Allen Rd, Macon, Georgia

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area.

**B. Site Determination**

There are no other facilities which could possibly be contiguous or adjacent and under common control.

**C. Existing Permits**

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
2621-021-0237-E-02-0	June 1, 2020	Operation of a tissue manufacturing facility, including the construction and operation of a new through air dry (TAD) tissue machine and a 156 MMBtu/hr boiler.

**D. Process Description**

1. SIC Codes(s)

2621 – Paper Mills

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility produces, converts, packages, warehouses, and distributes consumer tissue products.

3. Overall Facility Process Description

Baled pulp is repulped to produce a pulp slurry that feeds the forming section of the tissue machine to create a continuous fiber mat. The wet fiber mat then proceeds through a series of mechanical and thermal drying sections, including two natural gas-fired through air dryer (TAD) sections and a Yankee dryer section that is heated by process steam. The dried tissue is accumulated on a reel to produce large parent rolls, which are then conveyed to storage. From storage, the parent rolls are sent to the converting area to be processed into consumer-sized rolls and then packaged for shipment.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Irving Consumer Products, Inc. is located in Macon, Bibb County which is designated as “attainment” or “unclassifiable” for all criteria air pollutants. The major source threshold is 250 ton/yr since the manufacturing of tissue products is not classified as one of the 28 named sources whose major source threshold is 100 ton/yr. Potential emissions of all criteria pollutants are less than or limited to less than 250 ton/yr; therefore PSD is not triggered.

## 2. Title V Major Source Status by Pollutant

Table 2: 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	✓			✓
PM <sub>10</sub>	✓			✓
PM <sub>2.5</sub>	✓			✓
SO <sub>2</sub>	✓			✓
VOC	✓			✓
NO <sub>x</sub>	✓	✓		
CO	✓	✓		
Individual HAP	✓			✓
Total HAPs	✓			✓

## 3. MACT Standards

40 CFR 63 Subpart ZZZZ – *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

## 4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	N
Program Code 8 – Part 61 NESHAP	N
Program Code 9 - NSPS	Y
Program Code M – Part 63 NESHAP	Y
Program Code V – Title V	Y

## Regulatory Analysis

### II. Facility Wide Requirements

None applicable.

### III. Regulated Equipment Requirements

#### A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
BL01	Boiler 1	40 CFR 60 Subpart A 40 CFR 60 Subpart Dc GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(e)	None	None
BL02	Boiler 2	40 CFR 60 Subpart A 40 CFR 60 Subpart Db GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	None	None
DR01	TAD #1	GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	None	None
DR02	TAD #2	GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	None	None
DR03	TAD #3	GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	None	None
DR04	TAD #4	GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	None	None
EU01	Tissue Machine M8	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	None	None
EU02	Tissue Machine M9	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	None	None
MF01 MF02	Miscellaneous Space Heating	GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	None	None
EF01 EF02	Emergency Fire Pumps	40 CFR 60 Subpart IIII 40 CFR 63 Subpart ZZZZ GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	None	None
EMGEN01	Emergency Generator	40 CFR 60 Subpart JJJJ 40 CFR 63 Subpart ZZZZ GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	None	None

\* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

#### B. Equipment & Rule Applicability

##### Boilers 1 and 2 (Source Codes BL01 and BL02)

BL01 and BL02 are natural gas-fired boilers rated at 68.6 MMBtu/hr and 156 MMBtu/hr, respectively. These boilers are primarily used to provide steam for the tissue machines (Source Codes EU01 and EU02), with the potential to assist with building heat requirements. Each boiler is equipped with a low-NO<sub>x</sub> burner rated at 55,000 pounds of steam per hour for BL01 and 125,000 pounds of steam per hour for BL02.

The boilers are subject to the following rules and regulations:

- Georgia Rule 391-3-1-.02(2)(d)2.(ii) – Particulate Emissions
- Georgia Rule 391-3-1-.02(2)(d)3. – Visible Emissions
- Georgia Rule 391-3-1-.02(2)(g)2. – Sulfur Dioxide Emissions
- 40 CFR 60 Subpart Db – NSPS for Industrial-Commercial-Institutional Steam Generating Units (Boiler 2 only)
- 40 CFR 60 Subpart Dc – NSPS for Small Industrial-Commercial-Institutional Steam Generating Units (Boiler 1, fuel usage records only per 40 CFR 60.48c(g)(2))

Compliance with these regulations is demonstrated through the firing of natural gas. The NO<sub>x</sub> emission regulations found in Georgia Rules 391-3-1-.02(2)(yy), (lll), and (rrr) do not apply as the facility is located in Bibb County. The boilers are also exempt from 40 CFR 63 Subpart JJJJJ – Industrial, Commercial, and Institutional Boilers for Area Sources, per 40 CFR 63.11195(e).

The facility has elected to comply with an emission requirement of 0.050 lb NO<sub>x</sub> per MMBtu natural gas (50 lb NO<sub>x</sub> per million cubic feet) for each boiler. Compliance is demonstrated through the use of low-NO<sub>x</sub> burners.

The facility is required to comply with a 0.10 lb/MMBtu NO<sub>x</sub> emission limit for Boiler 2 under 40 CFR 60 Subpart Db. They are also required to conduct performance tests and comply with the monitoring, recordkeeping, and reporting requirements as found in 40 CFR 60.44b, §60.46b, §60.48b, and §60.49b.

*Through-Air Dryers (TAD) #1 and #2 (Source Codes DR01 and DR02)*

Tissue Machine M8 (Source Code EU01) is equipped with two through-air dryers rated at 111 MMBtu/hr and 50 MMBtu/hr. Each dryer is direct-fired, with the combustion products as part of the heated air stream. These dryers only fire natural gas and utilize low-NO<sub>x</sub> burners.

The dryers are subject to the following rules and regulations:

- Georgia Rule 391-3-1-.02(2)(d)2.(ii) – Particulate Emissions
- Georgia Rule 391-3-1-.02(2)(d)3. – Visible Emissions
- Georgia Rule 391-3-1-.02(2)(g)2. – Sulfur Dioxide Emissions

Compliance with these regulations is demonstrated through the firing of natural gas. The NO<sub>x</sub> emission regulations found in Georgia Rules 391-3-1-.02(2)(yy), (lll), and (rrr) do not apply to the dryers as the facility is located in Bibb County.

The facility has elected to comply with an emission requirement of 40 lb NO<sub>x</sub> per million cubic feet of natural gas input, as well as an emission requirement of 50 lb CO per million cubic feet of natural gas input. Compliance is demonstrated through the use of low-NO<sub>x</sub> burners.

Through-Air Dryers (TAD) #3 and #4 (Source Codes DR03 and DR04)

Tissue Machine M9 (Source Code EU02) is equipped with two through-air dryers rated at 111 MMBtu/hr and 50 MMBtu/hr. Each dryer is direct-fired, with the combustion products as part of the heated air stream. These dryers only fire natural gas and utilize low-NO<sub>x</sub> burners.

The dryers are subject to the following rules and regulations:

- Georgia Rule 391-3-1-.02(2)(d)2.(ii) – Particulate Emissions
- Georgia Rule 391-3-1-.02(2)(d)3. – Visible Emissions
- Georgia Rule 391-3-1-.02(2)(g)2. – Sulfur Dioxide Emissions

Compliance with these regulations is demonstrated through the firing of natural gas. The NO<sub>x</sub> emission regulations found in Georgia Rules 391-3-1-.02(2)(yy), (lll), and (rrr) do not apply to the dryers as the facility is located in Bibb County

The facility has elected to comply with an emission requirement of 40 lb NO<sub>x</sub> per million cubic feet of natural gas input, as well as an emission requirement of 50 lb CO per million cubic feet of natural gas input. Compliance is demonstrated through the use of low-NO<sub>x</sub> burners.

Miscellaneous Space Heating (Source Codes MF01 and MF02)

The miscellaneous space heating associated with Tissue Machine 8 (Source Code EU01) has a combined heat input rating of 57.1 MMBtu/hr and consists of the following: seven makeup air units (MUA), six rated at 7.421 MMBtu/hr and one rated at 4.02 MMBtu/hr; one emergency lighting generator rated at 0.862 MMBtu/hr; one ceiling supply unit (CSU) rated at 2.713 MMBtu/hr; one converting unit heater rated at 1.2 MMBtu/hr; and one office building heater rated at 1.185 MMBtu/hr.

The miscellaneous space heating associated with Tissue Machine 9 (Source Code EU02) has a combined heat input rating of 52.8 MMBtu/hr and consists of the following: seven MUAs, six rated at 7.421 MMBtu/hr and one rated at 4.02 MMBtu/hr; one emergency lighting generator rated at 0.862 MMBtu/hr; one CSU rated at 2.713 MMBtu/hr; and one bale handling unit heater rated at 0.69 MMBtu/hr

The CSUs create a false ceiling of heated air above each tissue machine that will hold moisture and fibers released from the within the capture zone of the process exhaust fans. Emissions are vented through these fans or through general building ventilation.

Additionally, the facility has installed a variety of natural gas-fired space heaters and HVAC air handling equipment to provide comfort heating in the docks and office spaces. The total heat input capacity of all the equipment is estimated to be less than 30 MMBtu/hr.

The space heating equipment is subject to the following rules and regulations:

- Georgia Rule 391-3-1-.02(2)(d)2.(ii) – Particulate Emissions
- Georgia Rule 391-3-1-.02(2)(d)3. – Visible Emissions
- Georgia Rule 391-3-1-.02(2)(g)2. – Sulfur Dioxide Emissions

Compliance with these regulations is demonstrated through the firing of natural gas.

*Tissue Machines M8 and M9 (Source Codes EU01 and EU02)*

Each tissue machine includes four major ventilation exhaust systems that run alongside the machine itself. The primary purpose of this ventilation is to remove moisture and water droplets released from the paper web during the papermaking and assuring that water does not settle back out onto the tissue. Some of the released water will entrain paper fibers. The water and fibers are removed from the air flow by a separator prior to the exhaust fan. The separator returns the water and fiber back into the paper slurry tank at the head of the tissue machine. Therefore, the separator is an integral component of the process operation and not a pollution control device. Chemicals contained in the glues and adhesives do not contain any VOCs or HAPs.

The tissue machines are subject to the following rules and regulations:

- Georgia Rule 391-3-1-.02(2)(b)1. – Visible Emissions
- Georgia Rule 391-3-1-.02(2)(e)2.(ii) – Particulate Emissions

Under Permit Nos. 2621-021-0237-S-01-0 and 2621-021-0237-E-02-0, the facility was permitted to comply with specific PM<sub>10</sub>/PM<sub>2.5</sub> emission rates for each exhaust system that were slightly higher than manufacturers' guarantees in order to provide a safety factor. Compliance with Rules (b) and (e) was demonstrated through compliance with the specific PM<sub>10</sub>/PM<sub>2.5</sub> emission rates since they were less than the allowable rate as calculated per Rule (e).

Based on stack testing results at EU02 submitted in March 2023 (TAD mist exhaust and glue containment exhaust) and in January 2024 (former exhaust and advantage wet dust exhaust), the facility has requested to replace these limits with a total production limit of 118,625 ODMT per consecutive 12-months for each tissue machine. Consecutive 12-month production records will be maintained to demonstrate compliance with this permit limit.

*Emergency Fire Pumps (Source Codes EFP01 and EFP02)*

The emergency fire pumps (EFP01 and EFP02) are two identical 327-hp diesel-fired fire pumps. Each is equipped with a double-walled diesel fuel storage tank that has a capacity of 460 gallons. Each tank is less than the 10,000 gallon threshold and are considered insignificant activities under Georgia Rule 391-3-1-.03(10)(g)8.(iii). Additionally, each pump/engine meets the Georgia definition of an insignificant activity per the requirements listed in Georgia Rule 391-3-1-.03(10)(g)2.(i) or (iv) and the construction permit exemption requirements in Georgia Rule 391-3-1-.03(6)(b).

The fire pumps are subject to the following rules and regulations:

- 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Engines
- 40 CFR 63 Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines
- Georgia Rule 391-3-1-.02(2)(d)2.(i) – Particulate Emissions



The facility complies with the operating and record-keeping requirements as found in Subpart IIII, as well as fuel usage requirements in §60.4207(b) and 40 CFR 80.510(b). Compliance with Subpart ZZZZ is demonstrated by meeting the requirements of Subpart IIII, per 40 CFR 63.6590(1)(c).

*Emergency Generator (Source Code EMGEN01)*

The emergency generator (EMGEN01) is a 116-hp natural gas-fired engine. It is exempt from permitting per Georgia Rule 391-3-1-.03(10)(g)2.(iv) and the construction permit exemption requirements in Georgia Rule 391-3-1-.03(6)(b)11.(i).

The generator is subject to the following rules and regulations:

- 40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
- 40 CFR 63 Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines
- Georgia Rule 391-3-1-.02(2)(d)2.(i) – Particulate Emissions

The facility complies with the operating and record-keeping requirements as found in Subpart JJJJ, as well as fuel usage requirements in §60.4240 and 40 CFR 80.510(b). Compliance with Subpart ZZZZ is demonstrated by meeting the requirements of Subpart JJJJ, per 40 CFR 63.6590(1)(c).

C. Permit Conditions

Pursuant to 40 CFR Part 52.21 Avoidance, Condition 3.2.1 (previously Condition 2.7) limits NO<sub>x</sub> and CO emissions from each of the dryers (Source Codes DR01, DR02, DR03, and DR04) to less than 40.0 lb/million cubic feet (mmcf) and 50.0 lb/mmcf, respectively.

Pursuant to 40 CFR Part 52.21 Avoidance, Condition 3.2.2 (previously Condition 2.8) limits NO<sub>x</sub> emissions from each of the Boilers (BL01 and BL02) to less than 50.0 lb/mmcf.

Conditions 3.2.3 and 3.2.4 (previously Conditions 2.3 and 2.4) set forth operating limits for Tissue Machines M8 and M9 (Source Codes EU01 and EU02), respectively. Under previous permitting, PM/PM<sub>10</sub>/PM<sub>2.5</sub> emission limits were established for each exhaust system. However, based on stack testing results at EU02 submitted in March 2023 and in January 2024, the facility has requested to replace these limits with a total production limit of 118,625 ODMT per consecutive 12-months for each tissue machine.

Condition 3.3.1 (previously Condition 2.13) requires the facility to comply with all applicable provisions of NSPS 60 Subparts A and Db for Boiler 2 (Source Code BL02).

Condition 3.3.2 (previously Condition 2.14) requires Boiler 2 (Source Code BL02) to comply with the NO<sub>x</sub> emission limit of 0.10 lb/MMBtu heat input, per 40 CFR 60 Subpart Db.

Condition 3.3.3 (previously Condition 2.9) requires the facility to comply with applicable requirements of 40 CFR 60 Subparts A and Dc for Boiler 1 (Source Code BL01).

Conditions 3.3.4, 3.3.5, and 3.3.6 (previously Conditions 2.10, 2.11, and 2.12) require the facility to comply with applicable requirements of 40 CFR 60 Subpart IIII, 40 CFR 60 Subpart JJJJ, and 40 CFR 63 Subpart ZZZZ for the emergency fire pumps (Source Code EFP01 and EFP02) and emergency generator (Source Code EMGEN01).

Condition 3.3.7 (previously Condition 2.6) requires the facility to only burn natural gas in the boilers (Source Codes BL01 and BL02), dryers (Source Codes DR01, DR02, DR03, and DR04), and miscellaneous space heating units (Source Code MF01).

Condition 3.4.1 (previously Condition 2.1) sets a visible emissions limit, the opacity of which is less than 40 percent for Tissue Machines M8 and M9 (Source Codes EU01 and EU02).

Condition 3.4.2 (previously Condition 2.2) sets a PM limit not to exceed the Georgia Rule (e) limit for the tissue machines (Source Codes EU01 and EU02).

Condition 3.4.3 (previously Condition 2.5) limits PM emissions from the boilers (Source Codes BL01 and BL02) to the allowable rate contained therein. It also limits the opacity of visible emissions from these sources to less than 20 percent, except for one 6-minute period per hour of less than 27 percent.

Condition 3.4.4 (previously Condition 3.1) limits fugitive emissions from the facility to less than 20 percent. It also indicates precautions to prevent dust from becoming airborne.

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

##### **A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

##### **B. Specific Testing Requirements**

Not applicable.

#### **V. Monitoring Requirements**

##### **A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

**B. Specific Monitoring Requirements**

Conditions 5.2.1 through 5.2.4 (previously Conditions 5.1 through 5.4) list monitoring requirements for NO<sub>x</sub> emissions from Boiler 2 (Source Code BL02) per 40 CFR 63 Subpart Db requirements. Monitoring of natural gas fuel usage in Boiler 1 was added in this Title V Operating Permit per the requirements of 40 CFR 60 Subpart Dc. Condition 5.2.2 also includes continuous monitoring of production for the tissue machines (Source Codes EU01 and EU02), which was added in this Title V Operating Permit as a replacement for the individual PM/PM<sub>10</sub>/PM<sub>2.5</sub> stack limits.

**C. Compliance Assurance Monitoring (CAM)**

Not applicable.

**VI. Record Keeping and Reporting Requirements****A. General Record Keeping and Reporting Requirements**

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a quarterly basis.

**B. Specific Record Keeping and Reporting Requirements**

Condition 6.1.7.a.i (previously Condition 7.6) contains NO<sub>x</sub> excess emission reporting requirements for Boiler 2 (Source Code BL02) per 40 CFR 60 Subpart Db.

Conditions 6.1.7.b.i and 6.1.7.b.ii contain exceedance reporting requirements in accordance with the total production limits of Conditions 3.2.3 and 3.2.4 for the tissue machines M8 and M9 (Source Codes EU01 and EU02). This reporting requirement was added in this Title V Permit.

Conditions 6.1.7.b.iii, 6.1.7.b.iv, and 6.1.7.b.v were added in this Title V Permit to outline the exceedance reporting requirements in accordance with the NO<sub>x</sub> and CO emission limits contained in Conditions 3.2.1 and 3.2.2.

Condition 6.2.1 (previously Condition 7.1) requires the facility to maintain monthly records of natural gas usage in Boiler 1 (Source Code BL01), per 40 CFR 60 Subpart Dc.

Conditions 6.2.2 through 6.2.4 (previously Conditions 7.3 through 7.5) outline recordkeeping and notification requirements for Boiler 2 (Source Code BL02), per 40 CFR 60 Subpart Db.

Condition 6.2.5 requires the facility to use production data to calculate the total quantity of product produced on Tissue Machines M8 and M9 (Source Codes EU01 and EU02). The information is used to demonstrate compliance with the 12-month rolling production limits for the PSD avoidance/PM limits in Conditions 3.2.3 and 3.2.4.

Condition 6.2.6 was added in this Title V Operating Permit to require the facility to calculate the NO<sub>x</sub> and CO emissions from the TAD dryers and boilers to compare against the emission limits in Conditions 3.2.1 and 3.2.2.

Conditions not carried over from Permit No. 2621-021-0237-E-02-0:

Condition 7.2 – This condition required the facility to submit notification of the actual start-up for Boiler 2 (Source Code BL02). Initial start-up was conducted July 29, 2021; therefore this condition is no longer necessary.

## **VII. Specific Requirements**

A. Operational Flexibility: Not applicable.

B. Alternative Requirements: Not applicable.

C. Insignificant Activities

See Permit Application on GEOS website.

See Attachment B of the permit

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. Stratospheric Ozone Protection Requirements: Not applicable.

J. Pollution Prevention: Not applicable.

K. Specific Conditions: Not applicable.

## **VIII. General Provisions**

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

**Addendum to Narrative**

The 30-day public review started on March 17, 2025 and ended on April 16, 2025. Comments from the facility were received by the Division on March 7, 2025 and are addressed below.

**Facility Comment 1:**

For BL01, Boiler 1, a natural gas fired boiler with a maximum heat input rating of 68.6 MMBtu/hr, we request that the reference to Rule 391-3-1-.02(2)(e), which is applicable to manufacturing processes, be removed and replaced with Rule 391-3-1-.02(2)(g). Subparagraph 2 of Rule 391-3-1-.02(2)(g) is specific to fuel burning sources less than 100 MMBtu/hr and limits the fuel sulfur to  $\leq 2.5\%$  by weight.

EPD Response: The Division agrees, and the change has been made. Table 3.1 in the draft permit has been revised.

**Facility Comment 2:**

Conditions 3.2.1 and 6.1.7 of the permit reference the following emissions limits for the dryers (Source Codes DR01, DR02, DR03, and DR04): 40.0 pounds of nitrogen oxides (NO<sub>x</sub>) per million cubic feet of natural gas input; and 50.0 pounds of carbon monoxide (CO) per million cubic feet of natural gas input. For consistency with the information submitted with the Tissue Machine 10 SIP application (Application No. 29539) should the emissions limits in the TV permit be: 29.0 pounds of nitrogen oxides (NO<sub>x</sub>) per million cubic feet of natural gas input; and 37.0 pounds of carbon monoxide (CO) per million cubic feet of natural gas input. The facility-wide PTE for NO<sub>x</sub> and CO in the Tissue Machine 10 SIP application is based on these emission factors for each dryer at the facility. The draft SIP application provided for review lists the lower NO<sub>x</sub> and CO emission factors for future Source Codes DR05 and DR06.

EPD Response: The emission limits of 40.0 lb NO<sub>x</sub> per MMft<sup>3</sup> of natural gas input and 50.0 lb CO per MMft<sup>3</sup> of natural gas input for Dryers DR01 through DR04 were requested by the facility and permitted under Permit No. 2621-021-0237-E-02-0. However, current facility potential NO<sub>x</sub> and CO emissions are below the newly requested limits of 29.0 lb/MMft<sup>3</sup> and 37.0 lb/MMft<sup>3</sup>, respectively. The Division agrees to this change. Permit Conditions 3.2.1 and 6.1.7 have been revised for consistency with the SIP application emission calculations. Note that the narrative to Draft Title V Permit No. 2621-021-0237-V-03-0 cannot be revised except under this addendum; however, these emission limits will be included in the narrative for SIP Application No. 29539.

**Facility Comment 3:**

Condition 6.2.5 of the draft permit implies a de-facto permit limit of 9,885.42 ODMT per month. This value represents 1/12th of the annual limit of 118,625 ODMT/rolling 12-month period. Regarding this permit condition: 118,625 ODMT/12-month period equates to 325 ODMT/day. 325 ODMT/day x 31 days = 10,075 ODMT/month which would result in an exceedance of the 1/12th of Production Limit (ODMT) value in this permit condition and require that a written notice be submitted to the Division? Irving will comply with the rolling 12-month recordkeeping and reporting requirement, and we request that the monthly limitation be removed from the permit. In the event the monthly limitation remains a permit condition, is this an enforceable limit? Could Irving incur a NOV for exceeding the monthly limit?

EPD Response: Should an exceedance of the monthly limit occur, then a written notice must be submitted to the Division. A notice of violation would not be incurred unless the annual limit is exceeded. Furthermore, to better capture this reporting, the production rate calculations were split into separate conditions, with the monthly calculations contained in Condition 6.2.5, the twelve-month rolling total calculations in New Condition 6.2.6, and the quarterly reporting requirement in New Condition 6.2.7. Draft Condition 6.2.6 was renumbered as Condition 6.2.8, as shown below.

- 6.2.5 The Permittee shall use the production data collected in accordance with Condition 5.2.2.b to calculate the total production rate on Tissue Machines M8 and M9 (Source Codes EU01 and EU02) on a monthly basis, in ODMT. The monthly productions totals shall be used to calculate production totals on a 12-month rolling basis. For any month during which total production rate exceeds the following amounts, the Permittee shall provide written notice to the Division. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the production rate limits in Conditions 3.2.3 and 3.2.4. The Permittee shall maintain these records on site at all times in a format suitable and available for inspection by or submittal to the Division on request  
[Avoidance of 40 CFR Part 52.21]

Source Code	1/12 <sup>th</sup> of Production Limit (ODMT)
EU01	9,885.42
EU02	9,885.42

- 6.2.6 The Permittee shall use the calculations required by Condition 6.2.5 to determine the twelve-month rolling product rate for each Tissue Machine M8 and M9 (Source Codes EU01 and EU02) for each calendar month. The Permittee shall notify the Division in writing if the production rate equals or exceeds 118,625 ODMT per unit during any consecutive twelve-month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the production rates in Conditions 3.2.3 and 3.2.4. The Permittee shall maintain these records on site at all times in a format suitable and available for inspection by or submittal to the Division on request.  
[Avoidance of 40 CFR Part 70 and 391-3-1-.02(6)(b)1.]
- 6.2.7 The Permittee shall submit the monthly production totals and 12-month rolling totals calculated during each reporting period per Conditions 6.2.5 and 6.2.6 with the quarterly report required by Condition 6.1.4.  
[391-3-1-.02(6)(b)1.]

- 6.2.8 The Permittee shall use the natural gas usage data collected in accordance with Conditions 5.2.2.a and 5.2.2.c to calculate the total quantity of natural gas used in Boilers 1 and 2 (Source Codes BL01 and BL02) and the TAD Dryers (Source Codes DR01, DR02, DR03, and DR04) on a monthly basis, in million cubic feet. The monthly usage rates shall be used to calculate usage totals on a 12-month rolling basis. These usage records shall be kept available for inspection or submittal for five years from the date of record. The Permittee shall then calculate the NO<sub>x</sub> and CO emission rates in order to determine compliance with the emission limits contained in Condition 3.2.1 and 3.2.2. These calculated values shall be reported during each reporting period with the quarterly report required by Condition 6.1.4.  
[Avoidance of 40 CFR 52.21]

**Facility Comment 4:****Regarding the Insignificant Activities Checklist and Insignificant Activities Based on Emission Levels in Attachment B:**

- Combustion Equipment, 4.iii) Natural gas, LPG, and/or diesel fuel... Update the quantity to two (2). Irving has two 327 hp, diesel fired fire pump engines.
- Storage Tanks and Equipment, 3 All petroleum liquid storage tanks with... Updated the quantity to two (2). Each diesel fired fire pump engines is equipped with one 460-gallon double-walled diesel storage tank.
- General ventilation roof exhaust vents in Tissue Machine Room. Update the quantity to ten (10). Each tissue machine is equipped with 5 roof vents.
- Steam system emergency vents. Update the quantity to two (2). One per boiler system.
- Dissolved air flotation (DAF) exhaust. Update the quantity to four (4). Two (2) per tissue machine.
- Diesel tank for fire pump. Updated the quantity to two (2). Each diesel fired fire pump engines is equipped with one 460-gallon double-walled diesel storage tank.
- 100 kW natural gas-fired emergency generator (EMGEN01). Update the description to *100 kW (116 hp) natural gas-fired emergency generator (EMGEN01)*.
- 315-hp diesel-fired emergency fire pumps (EFP01, EFP02). Update the description to *327-hp diesel-fired emergency fire pumps (EFP01, EFP02)*.

EPD Response: The requested revisions have been incorporated.

**Errata**

The reference to Condition 3.2.7 under Section III.C. in the narrative should also include MF02.