Equipment Location
Kimberly-Clark WorldWide inc., Fullerton Mill
2001 E. Orangethorpe Ave.
Fullerton, California 92831

PERMIT TO CONSTRUCT

Title V Permit Revision:
Application No. 526749

PERMIT TO CONSTRUCT
SECTION "H"

Equipment Description: (Previous Application 386885)

PROCESS 1: TISSUE AND TOWEL MFG					
Equipment	Device ID	Connected To	Source Type/ Monitoring Unit	Emissions	Equipment Specific Conditions
ACCUMULATOR, WITH FEED AND FOUR PICK-UP POINTS Reference A/N 387526	D61	C62		**PM: (9)[RULE 405, 2-7-1986]**	
SCRUBBER, VENTURI, 9FT-6IN DIA. X 33FT-7IN HT., THROAT LENGTH 12 INCHES, WITH A 250-HP EXHAUST FAN, TWO UPPER HOODS AND TWO LOWER HOODS. Reference A/N ~~386885~~ 526748	C62	D61		**PM: (9)[RULE 404, 2-7-1986]**	C8.1, C8.4, D323.1, D29.1, E139.1, K40.3, K67.3

Recommendation:
Permit to Construct is recommended for application No. 526748 subject to the following conditions:

Conditions:
C8-1 THE OPERATOR SHALL USE THIS EQUIPMENT IN SUCH A MANNER THAT THE DIFFERENTIAL PRESSURE BEING MONITORED BY CONDITION(S) LISTED BELOW IS NOT LESS THAN 8 INCHES WATER COLUMN.

TO COMPLY WITH THIS CONDITION, THE OPERATOR SHALL INSTALL AND MAINTAIN A(N) DIFFERENTIAL PRESSURE GAUGE TO ACCURATELY INDICATE THE DIFFERENTIAL PRESSURE ACROSS THE VENTURI SCRUBBER.

C8-4 THE OPERATOR SHALL USE THIS EQUIPMENT IN SUCH A MANNER THAT THE FLOW RATE BEING MONITORED , AS INDICATED BELOW, IN NOT LESS THAN 128 GPM.

TO COMPLY WITH THIS CONDITION, THE OPERATOR SHALL INSTALL AND MAINTAIN A(N) FLOW METER TO ACCURATELY INDICATE THE FLOW RATE IN THE LIQUID SUPPLY LINE TO THE SCRUBBER.

K67-3 THE OPERATOR SHALL KEEP ADEQUATE RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

DAILY RECORD KEEPING FOR THE PRESSURE DROP ACROSS THE SCRUBBER AND THE FLOW RATE OF WATER RECIRCULATION.

E139-1 THE OPERATOR SHALL ENSURE THAT ALL EQUIPMENT VENTED BY THIS EQUIPMENT SHALL BE INTERLOCKED WITH CONTROLS TO STOP THE OPERATION WHEN THE PARAMETER(S) SET BY CONDITION NUMBER 8-1 IS OUT OF SPECIFICATIONS FOR MORE THAN 3 MINUTES.

D323-1 THE OPERATOR SHALL CONDUCT AN INSPECTION FOR VISIBLE EMISSIONS FROM ALL STACKS AND OTHER EMISSION POINTS OF THIS EQUIPMENT _WHENEVER THERE IS A PUBLIC COMPLAINT OF VISIBLE EMISSIONS, WHENEVER VISIBLE EMISSIONS ARE OBSERVED, AND ON A SEMI-ANNUAL BASIS, AT LEAST, UNLESS THE EQUIPMENT DID NOT OPERATE DURING THE ENTIRE SEMI-ANNUAL PERIOD. THE ROUTINE SEMI-ANNUAL INSPECTION SHALL BE CONDUCTED WHILE THE EQUIPMENT IS IN OPERATION AND DURING DAYLIGHT HOURS.

IF ANY VISIBLE EMISSIONS (NOT INCLUDING CONDENSED WATER VAPOR) ARE DETECTED THAT LAST MORE THAN THREE MINUTES IN ANY ONE HOUR, THE OPERATOR SHALL VERIFY AND CERTIFY WITHIN 24 HOURS THAT THE EQUIPMENT CAUSING THE EMISSION AND ANY ASSOCIATED AIR POLLUTION CONTROL EQUIPMENT ARE OPERATING NORMALLY ACCORDING TO THEIR DESIGN AND STANDARD PROCEDURES AND UNDER THE SAME CONDITIONS UNDER WHICH COMPLIANCE WAS ACHIEVED IN THE PAST, AND EITHER:

1). TAKE CORRECTIVE ACTION(S) THAT ELIMINATES THE VISIBLE EMISSIONS _WITHIN 24 HOURS_ AND REPORT THE VISIBLE EMISSIONS AS A POTENTIAL DEVIATION IN ACCORDANCE WITH THE REPORTING REQUIREMENTS IN SECTION K OF THIS PERMIT; OR

2). HAVE _A CARB-CERTIFIED SMOKE READER_ DETERMINE COMPLIANCE WITH THE OPACITY STANDARD, USING EPA METHOD 9 OR THE PROCEDURES IN THE CARB MANUAL "VISIBLE EMISSION EVALUATION", _WITHIN THREE BUSINESS DAYS_ AND REPORT ANY DEVIATIONS TO AQMD.

THE OPERATOR SHALL KEEP THE RECORDS IN ACCORDANCE WITH THE RECORDKEEPING REQUIREMENTS IN SECTION K OF THIS PERMIT AND THE FOLLOWING RECORDS:
1). STACK OR EMISSION POINT IDENTIFICATION;
2). DESCRIPTION OF ANY CORRECTIVE ACTIONS TAKEN TO ABATE VISIBLE EMISSIONS;

3). DATE AND TIME VISIBLE EMISSION WAS ABATED; AND
4). ALL VISIBLE EMISSION OBSERVATION RECORDS BY OPERATOR OR A CERTIFIED SMOKE READER.

D29-1 THE OPERATOR SHALL CONDUCT SOURCE TEST(S) FOR THE POLLUTANT(S) IDENTIFIED BELOW:

POLLUTANT(S) TO BE TESTED	REQUIRED TEST METHOD	AVERAGING TIME	TEST LOCATION
PM10 EMISSIONS	APPROVED DISTRICT METHOD	DISTRICT APPROVED AVERAGING TIME	INLET/OUTLET OF A.P.C.

The test(s) shall be conducted within 90 days after achieving maximum production rate, but no later than 180 days after initial start-up.

K40-3 THE OPERATOR SHALL PROVIDE TO THE DISTRICT A SOURCE TEST REPORT IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:

Source test results shall be submitted to the District no later than 60 days after the source test was conducted

Emission data shall be expressed in terms of mass rate (lbs/hr). In addition, solid PM emissions, shall also be reported in terms of grains per DSCF

All exhaust flow rates shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute (DACFM)

Source test results shall also include the following parameters under which the test was conducted:

Moisture content
Temperature
Material throughput in lbs/hr
Web speed in feet/minute
The water flow rate to the scrubber in GPM
The pressure drop across the venturi scrubber in inches of water

Background

The venturi scrubber is being modified to add an additional pick-up point to the take-up reels on Tissue Machine #2 listed on the facility permit as device nos.14 - 17 in Process no. 1, System no. 2 in Section D of the permit. A daily throughput on device 56 of 340,000 lbs material processed per day is in place. There are no proposed changes to the Crepe Wadding Machine #2. The purpose for adding the additional pick-up point is

to increase collection to improve general housekeeping for this machine. They currently have a VOC cap which will not be impacted.

A source test conducted on April 1, 2003 to determine the control efficiency of the venturi scrubber showed a control efficiency of 99.36 percent with a permit limit at the time of 98 percent. The scrubber was also limited to a total PM emission of 1.03 lbs per hour and tested at 0.12 lbs per hour.

The changes to the exhaust system will add a pick-up point referenced as the “Lower Reel Hood #2” (LRH#2) which lies just below the tissue take-up reel. The ducting to the existing “Lower Reel Hood #1”(LRH#1) that vents the lower portion of the web coming off the dryer will be modified to allow splitting the ventilation between the new LRH#2 and the existing LRH#1. The “Upper Reel Hood #2”(URH#2) will have a reduced ventilation from 16,000 cfm to 6,000 cfm to accommodate the change in the lower reel ventilation. Each of the lower reel hoods will have a 9,000 cfm ventilation rate. The new exhaust system will have four pick-up hoods. URH#1 has a 12,000 cfm. The URH#2 has a ventilation rate of 16,000 cfm which will be reduced to 6,000 cfm. The LRH#1 & LRH#2 will use 9,000 cfm each for a total of 36,000 cfm. The changes to the ventilation will have no impact on the control efficiency but should increase the amount of total PM collected by the scrubber.

The scrubber was tested at 8 inches of water and showed a 99.6% control efficiency. Condition 8-1 requires that they operate the venturi scrubber at 8 inches of water or more with a water flow rate of 128 gallons per minute.

The operating schedule will be 24 hours per day, seven days per week, three hundred sixty days per year.

This is a RECLAIM Cycle 2 and title V facility. The proposed project is considered as a “minor” permit revision to this facility title V permit.

District records indicate that during the last two years Kimberly-Clark was issued two Notices to Comply (NC). NC D14420 was issued on 11/20/2009 requiring the applicant to demonstrate compliance with District Rule 2012, Appendix A Chapter 2(B) for all CEMs operated at this facility. By the follow-up inspection on 12/30/2009 the facility was in compliance with this NC.

NC E00498 was issued on 12/07/2010 requiring the applicant to use the correct entry of cal gas values into the CEMs. As of the follow-up inspection of 12/17/2010, the facility was in compliance with this NC. As of 9/28/2011, there are no other NC’s, NOV’s or complaints on record against this facility for the past two years.

Emissions Calculations

Any changes to the uncontrolled PM emissions will be incorporated after source testing is completed and will be evaluated into the P/O stage of this permit. For now, no change in emissions is assumed.

Particulate:

AEIS;	Daily:
R1 = 30.4 lbs/hr fed to the scrubber	R1 = 729.6 lbs/day
R2 = 0.120 lbs/hr	R2 = 2.88lbs/day

30-day average:

0.0 No emission increase

Annual:
R2 = 1,051.2 lbs/yr

Risk Assessment:
There will be no change to the basic equipment. The existing caps on the material processed and VOC emissions remain unchanged. The modification to the existing venturi scrubber will in effect improve the collection of the device and therefore reduce fugitive emissions. The modification will be exempt from the requirement of Rule 1401 pursuant to Rule 1401 g(1)(B), modification with No Increase in Risk, since the changes will not cause an increase in MICR or acute or chronic HI at any location.

Evaluation & Rule Review

Rule 212 (c)(1):This section requires a public notice for all new or modified permit units that emit air contaminants located within 1,000 feet from the outer boundary of a school.
No public notice is required since no school is located within 1,000 ft from the above site.

Rule 212 (c)(2):This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g).

The proposed project will not result in an emission increase for the entire facility that will exceed the daily maximums as specified under 212(g). A Rule 212(c)(2) notice will not be triggered.

Rule 212(c)(3):This section requires a public notice for all new or modified permit unit with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than 1E-6 per permit unit or greater than 10E-6 per facility.

The proposed project will not result in an increase of toxic emissions that will cause a MICR of one in a million or greater or generate a hazard index in excess of one. Therefore Public Notice is not required under this section of the rule.

Rule 212(g): This section requires a public notice for all new or modified sources that result in emission increases exceeding any of the daily maximums as specified by Rule 212(g).

There is no emission increase due to the modification of this equipment. The following summarizes emissions from this project:

	Maximum Daily Emissions					
	ROG	NO_x	PM_{10}	SO_2	CO	Pb
Emission increase	0	0	0	0	0	0
MAX Limit (lb/day)	**30**	**40**	**30**	**60**	**220**	**3**
Compliance Status	Yes	Yes	Yes	Yes	Yes	Yes

No public notice is required since no emission increase has occurred.

Rule 401: With proper maintenance and good operating practices, compliance with this rule is expected.

Rule 402: With proper maintenance and good operating practices, compliance with this rule is expected.

Rule 404: At 35,126 cfm, the maximum concentration of particulate matter allowed by this rule is 0.0494 gr/scf. Exhaust emission was determined at 0.0004 gr/dscf which will comply with the maximum allowable concentration of PM.

Rule 405: (340,000 lbs material/day)/(24hrs/day) = 14,167 lbs/hr
For a process rate of 14,167 lb/hr, the maximum PM discharge rate allowed by this rule is 10.08 lbs/hr. Previous testing has demonstrated emission to be less than 1.0 per hour.

REG XIII: New Source Review.
1303(a) BACT: The venturi scrubber will satisfy the BACT requirements as an add-on control used to control PM10 emissions from the number 2 crepe wadding machine.

1303(b) States that a new permit unit must meet each of the four requirements if there is an emission increase.

1) Modeling:
Previous source test confirmed that the total pm emission is 0.120 lbs/hr which is less than 0.41 lbs/hr PM_{10}. The accumulated PM_{10} emissions are expected to be decreased with the installation of a fourth exhaust hood.

2) Emission Offsets:
No offsets are required.

3) Facility Compliance:
This facility is in compliance with all District Rules and Regulations.

4) Major Polluting Facilities:
This facility is a major polluting facility, but the modification is not a major modification to a major polluting facility.

REG. XX: The modification to the venturi scrubber will have no impact to the facility NOx or SOx emissions, therefore compliance with this Regulation is expected.

REGULATION XXX:

This facility is in the RECLAIM program. The proposed project is considered as a “minor permit revision” for non-RECLAIM pollutants or hazardous air pollutants (HAPs), and a “minor permit revision” for RECLAIM pollutants to the RECLAIM/Title V permit for this facility.

Non-RECLAIM Pollutants or HAPs

Rule 3000(b)(6) defines a “minor permit revision” as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAPs) from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NOx*	40
PM10	30
SOx*	60
CO	220

* Not applicable if this is a RECLAIM pollutant

To determine if a project is considered as a "minor permit revision" for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V permit renewal shall be accumulated and compared to the above threshold levels. This proposed project is the 2nd permit revision to the Title V permit renewal issued to this facility on October 6, 2009. The following table summarizes the cumulative emission increases resulting from all permit revisions since the initial Title V permit was issued:

Revision	HAP	VOC	NOx*	PM10	SOx	CO
Previous Permit Revision Total Cumulative to date. Title V permit renewed October 6, 2009	0	0	1.0	0	0	-7.0
2nd Permit Revision; A/N 526749 Facility permit revision to; A/N 526748 by adding an additional pick-up point to the scrubber (C62) exhaust venting the Crepe Wadding Machine #2 (D61).	0	0	0	0	0	0
Cumulative Total	0	0	1.0	0	0	-7.0
Maximum Daily	30	30	40*	30	60	220

* RECLAIM pollutant, not subject to emission accumulation requirements

Since the cumulative emission increases resulting from all permit revisions are not greater than any of the emission threshold levels, this proposed project is considered as a "minor permit revision" for non-RECLAIM pollutants or HAPs.

RECOMMENDATION

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a "minor permit revision" it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision will be submitted to

EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility.

Conclusion:

This equipment will operate in compliance with all District Rule and Regulations. A Permit to Construct is recommended for application number 526748 subject to preceding conditions.