

International Paper Co.
601 E. Ball Rd.
Anaheim, CA 92805
ID: 157363

EQUIPMENT DESCRIPTION

Process 2: EXTERNAL COMBUSTION					
System 1: BOILERS					
BOILER, LPG, NATURAL GAS, CLEAVER BROOKS, 700 HP, WITH FLUE GAS RECIRCULATION, 28.6 29.3 MMBTU/HR	D27		NOX: LARGE SOURCE	CO: 2000 PPMV RULE 407, CO: 400 PPMV RULE 1146, NOX: 26 PPMV RULE 2012, NOX: 30 PPMV RULE 1303, NOX: 40 PPMV LPG, RULE 2012, PM: 0.1 GR/SCF RULE 409	D328.1 E113.1
A/N: 527273					

A/N 527275: RECLAIM/Title V permit revision application

CONDITIONS

D328.1:

THE OPERATOR SHALL DETERMINE COMPLIANCE WITH THE CO EMISSION LIMIT(S) EITHER: (A) CONDUCTING A SOURCE TEST AT LEAST ONCE EVERY FIVE YEARS USING AQMD METHOD 100.1 OR 10.1; OR (B) CONDUCTING A TEST AT LEAST ANNUALLY USING A PORTABLE ANALYZER AND AQMD-APPROVED TEST METHOD. THE TEST SHALL BE CONDUCTED WHEN THE EQUIPMENT IS OPERATING UNDER NORMAL CONDITIONS TO DEMONSTRATE COMPLIANCE WITH RULE 1146 CONCENTRATION LIMIT. THE OPERATOR SHALL COMPLY WITH ALL GENERAL TESTING, REPORTING, AND RECORDKEEPING REQUIREMENTS IN SECTIONS E AND K OF THIS PERMIT.

E113.1:

THE OPERATOR SHALL HAVE THE BURNER EQUIPPED WITH A CONTROL SYSTEM TO AUTOMATICALLY REGULATE THE COMBUSTION AIR, FUEL AND, IF APPLICABLE, RECIRCULATED FLUE GAS AS THE BOILER LOAD VARIES. THIS CONTROL SYSTEM SHALL BE ADJUSTED AND TUNED AT LEAST TWICE A YEAR ACCORDING TO THE MANUFACTURER'S SPECIFICATIONS TO MAINTAIN ITS ABILITY TO REPEAT THE SAME PERFORMANCE AT THE SAME FIRING RATE.

BACKGROUND

International Paper Co. submitted A/N 527273 to make a change in the Btu/hr rating of their boiler which is permitted under device no. D27 (A/N 491518). The correct rating of the boiler is 28.6 MMBtu/hr and not 29.3 MMBtu/hr, as previously permitted. International Paper Co. is unsure of the nature of the discrepancy. This is the only change requested with this application and it does not affect the operation of the boiler and there is no emission increase with this application.

International Paper Co. is a Title V facility. A Title V renewal permit was issued to this facility

on 5/11/2010. International Paper Co. has proposed to revise their Title V permit with application no. 527275 by making changes to a boiler (device no. 27). This permit revision is considered as a “minor permit revision” to the renewal Title V permit, as described in the Regulation XXX evaluation.

PROCESS DESCRIPTION

International Paper Co. manufactures corrugated sheets for the construction of cardboard boxes used for consumer packaging. They manufacture a variety of boxes ranging from food boxes to dry goods boxes. The boiler is used to provide steam for the process.

EMISSION ESTIMATES

The boiler will operate as before, without any changes. Emission estimates remain unchanged from the previous application. International Paper Co. operates up to 24 hrs/day and 7 days/wk.

Hourly CO emissions = 1.03 lb/hr (AEIS & NSR)
Hourly NO_x emissions = 1.05 lb/hr (AEIS & NSR)
Hourly PM₁₀ emissions = 0.09 lb/hr (AEIS & NSR)
Hourly ROG emissions = 0.08 lb/hr (AEIS & NSR)
Hourly SO_x emissions = 0.02 lb/hr (AEIS & NSR)

RULE ANALYSIS

RULE 212 (c)(1): A public notice is not required for this project since the emission source is not located within 1,000 feet from the outer boundary of a school. The closest school, Jefferson Thomas Elementary School, located to the emission source is 0.4 miles away.

RULE 212 (c)(2) & RULE 212(g): This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums specified in Rule 212(g). A public notice is not required since there isn't an emission increase.

RULE 212(c)(3): This section requires a public notice for all new or modified permit units with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in a cancer risk equal or greater than one in a million. There will not be a cancer risk equal or greater than one in a million.

RULES 401 & 402: AQMD database has no records of visible emissions or nuisance complaints against this facility. Compliance with these requirements is expected with the proper operation of the equipment.

RULE 1146: The boiler was last source tested on 12/16/2008 and NO_x and CO both corrected to 3% O₂ were 18.11 and 20.50 ppmv, respectively. The next source test is due by 6/30/2012. Compliance is achieved.

Regulation XIII: No emission increase with this application.

RULE 1401: No toxic emission increase with this application.

REGULATION XXX:

This facility is in the NO_x RECLAIM program. The proposed project is considered as a “minor permit revision” for RECLAIM pollutants to the RECLAIM/Title V permit for this facility.

Rule 3000(b)(12)(vi) defines a “minor permit revision” as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a “minor permit revision” pursuant to Rule 3000(b)(12)(A)(vi). This proposed project is the 1st permit revision to the Title V renewal permit issued to this facility on 5/11/2010. The following table summarizes the permit revisions:

Revision	HAP	VOC	NO _x	PM10	SO _x	CO
1 st Permit Revision: Correct permit wording (device no. D27)	0	0	0	0	0	0
Cumulative Emissions Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

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