

# South Coast Air Quality Management District

## Statement of Basis

### Proposed Title V Renewal Permit

**Facility Name:** Kimberly Clark Worldwide Inc., Fullerton Mill  
**Facility ID:** 021887  
**SIC Code:** 2621  
**Equipment Location:** 2001 East Orangethorpe Avenue  
Fullerton, CA 92831-5326

**Application #(s):** 563018  
**Application Submittal Date(s):** 04/03/14

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#### 1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and SCAQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the SCAQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The SCAQMD implements Title V through Regulation XXX – Title V Permits, adopted by the SCAQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO<sub>2</sub>, SO<sub>2</sub>, and CO are in attainment with federal standards. The status of lead is

nonattainment. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of Kimberly Clark Worldwide Inc., Fullerton Mill located at 2001 East Orangethorpe Avenue, Fullerton, CA 92831-5326. This facility is subject to Title V requirements because it is a major source.

## **2. Facility Description**

This is an existing facility that is engaged in the manufacturing of various paper products such as facial tissue and paper towels. The facility operates creped wadding machines, mixers, printers, a bath tissue line, multifolders, boilers, emergency internal combustion engines, a gas turbine, and other supporting equipment. Particulate matter (PM) emissions from the paper manufacturing operations are controlled by several venturi scrubbers, drum filters and a baghouse. Carbon monoxide (CO), volatile organic compounds (VOC), and nitrogen oxide (NO<sub>x</sub>) emissions from the gas turbine are controlled by an oxidation catalyst and a selective catalytic reduction (SCR) system.

## **3. Construction and Permitting History**

The facility has been in constant operation with a Title V permit at this location since 1999. Numerous permits to construct and or permits to operate have been issued to the facility since October 1999. A Title V renewal permit was issued to the facility on October 6, 2009.

## **4. Regulatory Applicability Determinations**

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is subject to the requirements of 40CFR 60 Subpart GG-Standards of Performance for Stationary Gas Turbines. The requirements of this NSPS are reflected in the Title V permit. In addition, the facility is an area source under 40CFR63 Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The requirements of this regulation are reflected in the permit.

To ensure that the facility is exempt from 40CFR 63 Subpart KK- National Emission Standards for the Printing and Publishing Industry, and 40CFR 63 Subpart YYYY- National Emission Standards for Hazardous Pollutants for Stationary Combustion Turbines, facility wide permit conditions are specified in the Title V permit limiting the quantity of a hazardous air pollutant emissions (HAP) from the facility to less than 10 tons per year and a combination of HAPs to less than 25 tons per year.

## **5. Monitoring and Operational Requirements**

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

PM emissions from the paper manufacturing operations are vented to venturi scrubbers, drum filters and a baghouse to control the PM emissions. However, since the PM<sub>10</sub> emissions vented to each scrubber, drum filter and the baghouse is less than 70 tons per year, the CAM requirements of 40 CFR Part 64 are not applicable to the PM control equipment.

NO<sub>x</sub> emissions from the gas turbine are controlled by an SCR system. However, since NO<sub>x</sub> is a RECLAIM pollutant and is subject to Regulation XX requirements of the SCAQMD, the CAM requirements are not applicable to the SCR system.

CO and VOC emissions from the gas turbine are vented to an air pollution control equipment oxidization catalyst. The uncontrolled VOC emissions to the catalyst is greater than the major source threshold for VOC of 10 tons per year. As a result, the air pollution control equipment is subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. Permit conditions have been added to satisfy the CAM requirements. Such permit conditions were developed using the design criteria and other pertinent requirements identified in 40 CFR 64- Compliance Assurance Monitoring and Technical Guidance Document and in the August 1998 Revised Draft CAM.

## **6. Permit Features**

### Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

### Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in

compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

## 7. Summary of Emissions and Health Risks

### Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2013

Pollutant	Emissions (tons/year)
NO <sub>x</sub>	8.169
CO	12.515
VOC	9.627
PM	16.356
SO <sub>x</sub>	0.055

### Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2013

The Following TACs Were Reported	Emissions (lbs/yr)
1,3-Butadiene	0.646
1,4-Dioxane	0.028
Ammonia	9076
Arsenic	0.001
Benzene	15
Formaldehyde	773
Cadmium	0.084
Chromium VI	0.083
Ethylene oxide	0.002
Lead (inorganic)	0.092
Naphthalene	1.505
PAH's	1.03

### Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The SCAQMD is tracking the status of the facility under AB2588.

## 8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 1999. The facility has been subject to both self-reporting requirements and SCAQMD inspections. The facility has had no citizen complaints, or Notices of Violation issued in the last two years. However, the facility was issued a Notice to Comply on 8/28/2013 requiring the applicant to

provide additional information regarding continuous emission monitoring system (CEMS) for boiler D40, RATA tests, meter calibration reports, tune reports, and provide CEMS data and emission calculation for compliance year 2012 RECLAIM emission audit. The facility provided the requested information and is currently operating in compliance with all applicable rules and permit conditions.

## **9. Compliance Certification**

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.