

State of Utah

SPENCER J. COX Governor

DEIDRE HENDERSON Lieutenant Governor Department of Environmental Quality

> Kimberly D. Shelley Executive Director

DIVISION OF AIR QUALITY Bryce C. Bird Director

DAQE-IN141070020-24

December 2, 2024

Seth Garner The Procter & Gamble Paper Products Company 5000 North Iowa String Road Bear River City, UT 84301 shepherd.d.8@pg.com

Dear Mr. Garner:

Re: Intent to Approve: Minor Modification to Approval Order DAQE-AN141070018-23 for the Addition of a Storage Tank at the Box Elder Facility Project Number: N141070020

The attached document is the Intent to Approve (ITA) for the above-referenced project. The ITA is subject to public review. Any comments received shall be considered before an Approval Order (AO) is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Future correspondence on this ITA should include the engineer's name, **Tad Anderson**, as well as the DAQE number as shown on the upper right-hand corner of this letter. Tad Anderson, can be reached at (385) 306-6515 or tdanderson@utah.gov, if you have any questions.

Sincerely,

Jon L. Black, Manager New Source Review Section

JLB:TA:jg

cc: Bear River Health Department EPA Region 8

STATE OF UTAH Department of Environmental Quality Division of Air Quality

INTENT TO APPROVE DAQE-IN141070020-24 Minor Modification to Approval Order DAQE-AN141070018-23 for the Addition of a Storage Tank

Prepared By Tad Anderson, Engineer (385) 306-6515 tdanderson@utah.gov

Issued to The Procter & Gamble Paper Products Company - Box Elder Facility

> Issued On December 2, 2024

Jon (Bhild) Black (Dec 2, 2024 10:33 MST)

New Source Review Section Manager Jon L. Black

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GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name The Procter & Gamble Paper Products Company Source Name The Procter & Gamble Paper Products Company - Box Elder Facility

Mailing Address 5000 North Iowa String Road Bear River City, UT 84301 **Physical Address** 5000 North Iowa String Road Bear River City, UT 84301

Source Contact Name: Dean Shepherd Phone: (435) 279-1377 Email: shepherd.d.8@pg.com **UTM Coordinates** 402500 m Easting

4605600 m Northing Datum NAD27 UTM Zone 12

SIC code 2621 (Paper Mills)

SOURCE INFORMATION

General Description

The Procter & Gamble Paper Products Company (P&G) operates the Box Elder Facility. The Box Elder facility produces paper and assembled paper products. The Box Elder facility is located in Bear River City, Utah.

<u>NSR Classification</u> Minor Modification at Major Source

Source Classification Located in Box Elder County Airs Source Size: A

Applicable Federal Standards NSPS (Part 60), A: General Provisions NSPS (Part 60), Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units NSPS (Part 60), IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines NSPS (Part 60), JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines MACT (Part 63), A: General Provisions MACT (Part 63), ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines MACT (Part 63), CCCCCC: National Emission Standards for Hazardous Air Pollutants for DAQE-IN141070020-24 Page 4

Source Category: Gasoline Dispensing Facilities Title V (Part 70) Major Source

Project Description

P&G has requested to add a sodium bisulfate tank. The additional 6,300-gallon sodium bisulfite tank is necessary in its Assembled Paper Products B operations, and it is recognized that a minor amount of SO₂ emissions result from the breathing and filling of the tank.

The original NOI that was submitted to UDAQ had a sodium bisulfate tank size of 4,000 gallons, but additional information was submitted on September 11, 2024, requesting the size to be increased to 6,300 gallons.

SUMMARY OF EMISSIONS

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

Criteria Pollutant	Change (TPY)	Total (TPY)
CO ₂ Equivalent	0	280301.00
Carbon Monoxide	0	184.81
Nitrogen Oxides	0	138.84
Particulate Matter - PM ₁₀	0	164.63
Particulate Matter - PM _{2.5}	0	142.03
Sulfur Oxides	0.05	4.28
Volatile Organic Compounds	0	130.07

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Acetaldehyde (CAS #75070)	0	13
Acrylamide (CAS #79061)	0	194
Benzene (Including Benzene From Gasoline) (CAS #71432)	0	17
Epichlorohydrin (L-Chloro-2,3-Epoxypropane) (CAS #106898)	0	16
Formaldehyde (CAS #50000)	0	325
Generic HAPs (CAS #GHAPS)	0	1011
Hexane (CAS #110543)	0	6286
Methanol (CAS #67561)	0	18132
Methyl Methacrylate (CAS #80626)	0	82
Propylene[1-Propene] (CAS #115071)	0	646
Toluene (CAS #108883)	0	45
Xylenes (Isomers And Mixture) (CAS #1330207)	0	25
	Change (TPY)	Total (TPY)
Total HAPs	0	13.40

PUBLIC NOTICE STATEMENT

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Director.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the intent to approve will be published in the Box Elder News & Journal on December 4, 2024. During the public comment period the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing within 15 days of publication, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

SECTION I: GENERAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

I.1	All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
I.2	The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
I.3	Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
I.4	All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]
1.5	At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
I.6	The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]
I.7	The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]

I.8	The owner/operator shall submit documentation of the status of construction of the 16B paper machine and natural gas-fired emergency generator to the Director within 18 months from November 16, 2023. The owner/operator shall submit documentation of the status of construction of the sodium bisulfite tank to the Director within 18 months from the date of this AO. This AO may become invalid if construction is not commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the documentation to the Director, attn.: NSR Section. [R307-401-18]

SECTION II: PERMITTED EQUIPMENT

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.A <u>THE APPROVED EQUIPMENT</u>

II.A.1	The Procter & Gamble - Box Elder Facility
II.A.2	Paper Machine 15B One (1) Paper Machine Natural Gas-Fired dryer Size: 150 MMBTU/hr Controls: Low NOx burner Stack Height: 33.53 meters Stack Diameter: 2.19 meters Stack Flow rate: 183,335 acfm Cyclonic Separator (wet end of process and under machine exhaust) Venturi Scrubber (dry end of process) with a PM ₁₀ Control Efficiency: approximately 95%* *Not for determining compliance but for replacement-in-kind.
II.A.3	Paper Machine 16B One (1) Paper Machine Natural Gas-Fired dryer Size: 130 MMBTU/hr (combined) Paper Machine Dryer Controls: Ultra-Low NOx burner Make up Air Units Controls: Low NOx burners Venturi Scrubber (dry end stack) Cyclonic Separator (wet end of process and under machine exhaust)

II.A.4	Paper Product and Utility BoilersTwo (2) Natural Gas-Fired Paper Product BoilersMaximum Capacity: 60.24 MMBTU/hr (each)Controls: Low-NOx BurnersSecondary fuel: Propane (emergency or curtailment)Two (2) Natural Gas-Fired Utility BoilersMaximum Capacity: 50 MMBTU/hr (each)Controls: Ultra-Low NOx BurnersOne (1) Natural Gas Back-Up Boiler (if boilers are out of service)			
П.А.5	Paper Product Converting OperationOne (1) Paper Product Converting OperationPM10 Controls: Three (3) existing Drum Filters -Vent to AtmosphereTwo (2) New Baghouses - Vent IndoorsFive (5) Converting Lines			
II.A.6	Assembled Paper Product A Baghouse One (1) Assembled Paper Product Baghouses			
II.A.7	Assembled Paper Product A Drum Filters Four (4) Assembled Paper Product Drum Filters			
II.A.8	Assembled Paper Product A Equipment Pneumatic Pumps			
II.A.9	Assembled Paper Product A Portable Dry Vacuum Unit			
II.A.10	Assembled Paper Product B Dryer Capacity: 10 MMBtu/hr (4-2.5 MMBtu/hr burners)			
II.A.11	Assembled Paper Product B Drum Filter System Drum Filter systems			
II.A.12	Assembled Paper Product B Baghouse/Fabric Filter Three (3) Baghouses: 1) Briquetter Baghouse 2) Active Ingredient Baghouse 3) Central Vacuum System Baghouse			
II.A.13	Storage Tank (NEW) Sodium Bisulfite Storage Tank Capacity: 6,300 gallons			
II.A.14	FAM RTO Burner Size: 2 MMBtu/hr Control: Low-NO _x Burner Flow Rate: 7,500 scfm			
II.A.15	FAM Silo			
II.A.16	Assembled Paper Product B Equipment Pneumatic Pumps			

II.A.17	Assembled Paper Product B Inks RTO Burner Size: 1 MMBtu/hr Flow Rate: 2,500 scfm
II.A.18	Diesel-Fired Back-Up Engines Five (5) Emergency Equipment
	Two (2) Fire Pumps Maximum Capacity: 375 hp (each)
	Two (2) Fire Pumps Maximum Capacity: 399 hp (each)
	One (1) Power Generator Maximum Capacity: 1,214 hp
II.A.19	Natural Gas-Fired Back-Up Engines One (1) Emergency Generator Capacity: 54 hp (40kW)
	One (1) Emergency Generator Capacity: 1006 hp (750kW)
II.A.20	Cooling Towers Multiple cooling towers with drift eliminators (0.001%) to support the facility.
II.A.21	TanksMultiple tanks including diesel and gasoline fuel storage and various raw material storage tanks.
	40 CFR 60 Subpart Kb is not applicable to these storage tanks based on exemptions listed under 40 CFR 60.110b(b).
II.A.22	FAM Making Operations Tanks Capacity: 500-gallons Material: Sodium Bisulfite
	Capacity: 6,000-gallons Material: Sodium Bisulfite
	Capacity: 60-gallons Material: 25% mixture HCl
II.A.23	Multiple Space Heaters
II.A.24	Truck Loading

SECTION II: SPECIAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.B.1	Site Wide Requirements			
II.B.1.a	Visible emissions from the following emission points shall not exceed the following values:			
	A. All natural gas operated equipment - 10% opacity			
	B. Cooling towers - 10 % opacity			
	C. Baghouses - 10% opacity			
	D. RTO - 10% opacity			
	E. All other points - 20% opacity.			
	[R307-401]			
II.B.1.a.1	The permittee shall conduct a monthly 1-minute visible emissions test of each affected source in accordance with 40 CFR 60, Appendix A, Method 22.			
	If no visible emissions are observed in six consecutive monthly tests for any affected source, the permittee may decrease the frequency of testing from monthly to semi-annually for the affected source. If visible emissions are observed during any semi-annual test, the permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed for six consecutive monthly tests. If no visible emissions are observed during two consecutive semi-annual tests for any affected source, the permittee may decrease the frequency of testing from semi-annually to annually for the affected source. If visible emissions are observed during two consecutive semi-annual tests for any affected source, the permittee may decrease the frequency of testing from semi-annually to annually for the affected source. If visible emissions are observed during any annual test, the permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed for six consecutive monthly tests.			
	If visible emissions are observed during any Method 22 test, a current Method 9 certified observer shall conduct a:			
	1) six minute test of opacity in accordance with 40 CFR 60, Appendix A Method 9 for point sources, or			
	2) one minute test of opacity with five second observation intervals in accordance with 71 FR 55126, Method 203C for fugitive emission sources			
	3) the Method 9 or 203C test shall begin within 24 hours of any observation of visible emission.			
	[R307-401-8]			
II.B.1.a.2	Records of visible emission tests performed and data required by 40 CFR 60, Appendix A, Method 22, Method 9, or 58 FR 61640, Method 203C shall be maintained. [R307-401-8]			

II.B <u>REQUIREMENTS AND LIMITATIONS</u>

II.B.1.b	The plant-wide emissions of VOCs and HAPs from the operations shall not exceed:
	130.07 tons of VOC emissions per rolling 12-month period
	3.14 tons of Hexane per rolling 12-month period
	9.07 tons of Methanol per rolling 12-month period.
	[R307-401-8]
II.B.1.b.1	Compliance with each limitation shall be determined on a rolling 12-month total. Based on the last day of each month, a new 12-month total shall be calculated using data from the previous 12 months. Monthly calculations shall be made no later than 30 days after the end of each calendar month. [R307-401-8]
II.B.1.b.2	VOC and HAP emissions shall be determined by maintaining a record of VOC and HAP emitting materials used each month if applicable to the product in sections 1, 2, and 3 below and/or to emission calculations in section 4. The record shall include the following data for each material used for calculating the rolling 12-month total:
	1. Name of the VOC or volatile HAP-emitting process material
	2. Percent by weight of all VOC and volatile HAP in each process material used
	3. Quantity of each VOC and volatile HAP emitting process material used in pounds
	4. The amount of VOC and volatile HAP emitted monthly by each process material used, calculated by the following procedure:
	VOC = (% VOC by Weight) x (Quantity of Chemical Used in lbs./100) x (1 ton/2000 lb) Or an alternative VOC calculation consistent with US EPA emission calculation methodologies
	HAP = (% HAP by Weight) x (Quantity of Chemical Used in lbs./100) x (1 ton/2000lb) Or an alternative HAP calculation consistent with US EPA emission calculation methodologies
	5. The amount of VOC and volatile HAP emitted monthly from all materials used
	6. The amount of VOC and volatile HAP reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above to provide the monthly total VOC and volatile HAP emissions.
	[R307-401-8]
II.B.1.c	The backup boiler may only be used during periods when a permitted boiler is taken out of service. The backup boiler and the permitted boiler must not be operated at the same time, except for periods of post-repair readiness checks and initial start-up of the permitted boiler. The backup boiler shall only burn natural gas or propane. The backup boiler capacity shall not exceed the boiler capacity listed in equipment section of this permit. Emission testing for the backup boiler shall not be required, and emissions rates shall be guaranteed by vendor documentation. [R307-401-8]
II.B.1.d	The owner/operator shall use natural gas as fuel in all equipment listed in this permit as a primary fuel and propane as a backup fuel in the boilers (except for listed emergency equipment, which is diesel operated). [R307-401-8]

II.B.2	Paper Making Requirements			
II.B.2.a	The paper-making machines 15B and 16B shall include cyclone separators (installed on the Under Dryer Stacks and Wet End Stacks) and a venturi scrubber (installed on the Dry End Stacks) to control PM/PM ₁₀ /PM _{2.5} emissions. [R307-401-8]			
II.B.2.b	The owner/operator shall maintain the pressure drop across the venturi scrubbers at no less than 4 inches of water gauge when the unit is operating and venting to the atmosphere. [R307-401-8]			
II.B.2.b.1	Monitor the scrubber differential pressure once per operating day. [R307-401-8]			
II.B.2.b.2	Results of daily pressure drop readings shall be maintained. [R307-401-8]			
II.B.2.c	One (1) drum filter for each of the existing 3 paper making converting lines shall control process streams from the paper making converting operation when venting to the atmosphere. [R307-401-8]			
II.B.2.d	The permittee shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the change in pressure of the gas stream through the paper-making converting room drum filters. The monitoring device must be certified by the manufacturer to be accurate within plus or minus one inch of water gauge and must be calibrated on an annual basis in accordance with the manufacturer's instructions. Continuous recording for the monitoring device is not required. When the paper-making converting room drum filters are in operation and venting to the atmosphere, the pressure drop shall be no less than 1 inch of water gauge (w.g.) for more than five minutes in any 60-minute period except during start-up and shut-down of the converting dust control fans. The permittee is not restricted to a minimum pressure drop across the control device for the first 96 consecutive hours after replacement of a filter. This seasoning-in period shall last no more than 96 hours. [R307-401-8]			
II.B.2.d.1	Monitor the drum filter pressure drop once per operating day. [R307-401-8]			
II.B.2.d.2	Records of the pressure drop shall be maintained. [R307-401-8]			
II.B.2.e	The owner/operator shall not exceed 96,360 MMBtu per rolling 12-month total of the 16B make- up air units. [R307-401-8]			
II.B.2.e.1	To determine the operational limitation for the 16B make-up air units, the owner/operator shall maintain a monthly log tracking the MMBtu per rolling 12-month total. [R307-401-8]			
II.B.2.f	The owner/operator shall not exceed 163,800 gallons of sodium bisulfite per rolling 12-month in the storage tank. [R307-401-8]			
II.B.2.f.1	To determine the throughput for the sodium bisulfite tank, the owner/operator shall maintain a monthly log tracking the gallons per rolling 12-month total. [R307-401-8]			

II.B.3	Stack Testing Requirements				
II.B.3.a	The owner/operator shall not emit more than the following rates and concentrations from the				
	indicated emissions unit(s):				
		r Machine 15B Process			
	Pollutant	lb/hr	lb/MMBTU		
	PM _{2.5}	6.65	0.044		
	NO _x	13.50	0.09		
	CO	15.75	0.105		
	***Dana	r Machine 16B Process	Stock ***		
	Pollutant	lb/hr	lb/MMBTU		
	PM _{2.5}	6.65	0.05115		
	NO _x	3.95	0.03		
	CO	4.82	0.037		
		r Making Boilers*** (e			
	Pollutant	lb/hr	ppmdv		
	PM _{2.5}	0.9	ŇA		
	NO _x	3.3	45		
	CO	3.0	70		
	14:1:	Doilano (acab)			
	Pollutant	ty Boilers*** (each) lb/hr	nnmdy		
	$PM_{2.5}$	0.74	ppmdv NA		
	NO _x	1.80	10		
	CO	4.06	156		
	00	1.00	100		
	[R307-401-8]				
II.B.3.a.1	Initial Test				
	The owner/operator shall conduct an initial stack test for the Paper Machine 16B Process Stack				
	within 180 days after startup. [R307-165-2]				
II.B.3.a.2	Test England				
п.в.э.а.2	Test Frequency The super/energies shall conduct subsequent stack tests for the following emissions units				
	The owner/operator shall conduct subsequent stack tests for the following emissions units according to the following schedule. The owner/operator must complete subsequent stack tests				
	within the indicated time after the date of the most recent stack test for the specified emission				
	unit.				
	Test every three (3) years for:				
	Paper Machine 15B Process Stack				
	Paper Machine 16B Process Stack				
	Utility Boilers				
	Paper Machine Boilers				
	The Director may require the sum or (encertar to norform a stark test of any time [D207, 165, 2]				
	The Director may require the owner/operator to perform a stack test at any time. [R307-165-2]				
II.B.3.a.3	Notification				
п.р.э.а.э	At least 30 days prior to conducting a stack test, the owner/operator shall submit a source test				
	protocol to the Director. The source test protocol shall include the items contained in				
	R307-165-3. If directed by the Director, the owner/operator shall attend a pretest conference.				
	[R307-165-3]				

II.B.3.a.5 PM25 Total PM25 Filterable PM25 You CFR 60, Appendix A, Method 5: 40 CFR 51, Appendix M, Method 201A or other EPA-approved testing method as acceptable to the Director. If tother approved testing methods are used which cannot measure the PM25 fraction of the filterable particulate emissions, all of the filterable particulate emissions, shall be considered PM25. Condensable PM25 40 CFR 51, Appendix M, Method 202, or other EPA-approved testing method as acceptable to the Director. Total PM25 40 CFR 60.8(b)(2), Appendix A, including EPA-approved testing method as acceptable to the Director. II.B.3.a.6 NO ₄ 40 CFR 60, Appendix A, Method 7; Method 7E; or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.3.b CO 40 CFR 60, Appendix A, Method 10, or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.4 Assembled Paper Products Requirements II.B.4 Assembled Paper Product Requirements II.B.4.0 The emissions from the assembled paper products A and B converting operation shall be routed to the assembled paper product drum filters and the assembled paper product baghouses. [R307-401-8] II.B.4.5 The assembled paper product drum filters and the assembled paper product baghouses. [R307-401-8] II.B.4.5 The assembled paper product drum filters and the assembled paper product baghouses. [R307-401-8]	II.B.3.a.4	Reporting Within 60 days after completing a stack test, the owner/operator shall submit a written report of the results from the stack testing to the Director. The report shall include validated results and supporting information. [R307-165-5]
40 CFR 60, Appendix A, Method 5: 40 CFR 51, Appendix M, Method 201A or other EPA-approved testing method as acceptable to the Director. If other approved testing methods are used which cannot measure the PM _{2.5} fraction of the filterable particulate emissions, all of the filterable particulate emissions shall be considered PM _{2.5} . Condensable PM _{2.5} 40 CFR 51, Appendix M, Method 202, or other EPA-approved testing method as acceptable to the Director. Total PM _{2.5} 40 CFR 60.8(b)(2), Appendix A, including EPA-approved testing method or M 37. [R307-401-8] II.B.3.a.6 NO, 40 CFR 60, Appendix A, Method 7: Method 7E; or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.3.b CO H.B.3.a.6 NO, 40 CFR 60, Appendix A, Method 10, or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.3.b CO II.B.4 Assembled Paper Products Requirements II.B.4.a The emissions from the assembled paper products A and B converting operation shall be routed to the assembled paper product drum filters and the assembled paper product baghouses. [R307-401-8] II.B.4.b The assembled paper product drum filters and the assembled paper product baghouses. [R307-401-8] II.B.4.b. The emissions from the assembled paper product A and B converting operation shall be operated and maintained in accordance with the manufacturer's specifications. The drum filters and baghouses, while in operation and venti	II.B.3.a.5	
40 CFR 51, Appendix M, Method 202, or other EPA-approved testing method as acceptable to the Director. Total PM _{2.5} 40 CFR 60.8(b)(2), Appendix A, including EPA-approved testing method OTM 37. [R307-401-8] II.B.3.a.6 NO _x 40 CFR 60, Appendix A, Method 7; Method 7E; or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.3.b CO 40 CFR 60, Appendix A, Method 10, or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.4 Assembled Paper Products Requirements II.B.4.a The emissions from the assembled paper products A and B converting operation shall be routed to the assembled paper products drum filters and the assembled paper product baghouses. [R307-401-8] II.B.4.b The assembled paper product drum filters and the assembled paper product baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The drum filters and baghouses, shall be equipped with gauges or meters, which indicate the pressure drop across the control device is grater than or equal to 0.5 inches of water column, except during start-up and shutdown of the fans. The permitte is not restricted to a minimum pressure drop across the control device for the first 96 hours of operation after replacement of the filter media on the drum filter or a bag(s) in the baghouse. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [R307-401-8] II.B.4.b.1 The permittee shall monitor the operating press		40 CFR 60, Appendix A, Method 5; 40 CFR 51, Appendix M, Method 201A or other EPA- approved testing method as acceptable to the Director. If other approved testing methods are used which cannot measure the $PM_{2.5}$ fraction of the filterable particulate emissions, all of the
40 CFR 60.8(b)(2), Appendix A, including EPA-approved testing method OTM 37. [R307-401-8] II.B.3.a.6 NO _λ 40 CFR 60, Appendix A, Method 7; Method 7E; or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.3.b CO 40 CFR 60, Appendix A, Method 10, or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.4 Assembled Paper Products Requirements II.B.4.a The emissions from the assembled paper products A and B converting operation shall be routed to the assembled paper products drum filters and the assembled paper product baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The drum filters and baghouses shall be equipped with gauges or meters, which indicate the pressure drop across the control device. The pressure gauges or meters shall be located such that an inspector/operator can safely read the indicators at any time. The drum filters and baghouses, while in operation and venting to the tamosphere, shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.5 inches of water column, except during start-up and shutdown of the fans. The permittee is not restricted to a minimum pressure drop across the control device is greater than or equal to 0.5 inches of water column, except during start-up and shutdown of the fans. The permittee is not persting after epi across each drum filter on a bag(s) in the baghouse. The operating pressure drop across each drum filter and each baghouse once per operating day. [R307-401-8] II.B.4.b.1 The permittee shall monitor the operating pressure drop across e		40 CFR 51, Appendix M, Method 202, or other EPA-approved testing method as acceptable to
II.B.3.a.6 NOx 40 CFR 60, Appendix A, Method 7; Method 7E; or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.3.b CO 40 CFR 60, Appendix A, Method 10, or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.4 Assembled Paper Products Requirements II.B.4.a The emissions from the assembled paper products A and B converting operation shall be routed to the assembled paper product drum filters and the assembled paper product baghouses. [R307-401-8] II.B.4.b The assembled paper product drum filters and the assembled paper product baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The drum filters and baghouses shall be equipped with gauges or meters, which indicate the pressure drop across the control device. The pressure gauges or meters shall be located such that an inspector/operator can safely read the indicators at any time. The drum filters and baghouses, while in operation and venting to the atmosphere, shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.5 inches of water column, except during start-up and shutdown of the fans. The permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours of operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [R307-401-8] II.B.4.b.1 The permittee shall monitor the operating pressure drop across each drum filter and each baghouse once per operating day. [R307-401-8] II.B.4.b.2 The permittee shall maintain an operating and maintenance log for each drum filter		
40 CFR 60, Appendix A, Method 7; Method 7E; or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.3.b CO 40 CFR 60, Appendix A, Method 10, or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.4 Assembled Paper Products Requirements II.B.4.a The emissions from the assembled paper products A and B converting operation shall be routed to the assembled paper products drum filters and the assembled paper product baghouses. [R307-401-8] II.B.4.b The assembled paper product drum filters and the assembled paper product baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The drum filters and baghouses shall be equipped with gauges or meters, which indicate the pressure drop across the control device. The pressure gauges or meters shall be located such that an inspector/operator can safely read the indicators at any time. The drum filters and baghouses, while in operation and venting to the atmosphere, shall be operated such that the minimum pressure drop across each control device is greater than or equal to 0.5 inches of water column, except during start-up and shutdown of the fans. The permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours of operation after replacement of the filter media on the drum filters or a bag(s) in the baghouse. The operating pressure drop across each control device is greater than or equal to 0.5 inches of water column, except during start-up and shutdown of the fans. The permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours of operation after replacement of the filter media on the drum filter or a bag(s) in the baghouse. The oper		[R307-401-8]
40 CFR 60, Appendix A, Method 10, or other EPA-approved testing method as acceptable to the Director. [R307-401-8] II.B.4 Assembled Paper Products Requirements II.B.4.a The emissions from the assembled paper products A and B converting operation shall be routed to the assembled paper products drum filters and the assembled paper product baghouses. [R307-401-8] II.B.4.b The assembled paper product drum filters and the assembled paper product baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The drum filters and baghouses shall be equipped with gauges or meters, which indicate the pressure drop across the control device. The pressure gauges or meters shall be located such that an inspector/operator can safely read the indicators at any time. The drum filters and baghouses, while in operation and venting to the atmosphere, shall be operated such that the minimum pressure drop across each control device is greater than or equal to 0.5 inches of water column, except during start-up and shutdown of the first 96 hours of operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [R307-401-8] II.B.4.b.1 The permittee shall monitor the operating pressure drop across each drum filter and each baghouse once per operating day. [R307-401-8] II.B.5. FAM Operations Requirements II.B.5.a The emissions from the FAM raw material operational tanks, curing oven, and treatment from	II.B.3.a.6	40 CFR 60, Appendix A, Method 7; Method 7E; or other EPA-approved testing method as
II.B.4.a The emissions from the assembled paper products A and B converting operation shall be routed to the assembled paper products drum filters and the assembled paper product baghouses. [R307-401-8] II.B.4.b The assembled paper product drum filters and the assembled paper product baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The drum filters and baghouses shall be equipped with gauges or meters, which indicate the pressure drop across the control device. The pressure gauges or meters shall be located such that an inspector/operator can safely read the indicators at any time. The drum filters and baghouses, while in operation and venting to the atmosphere, shall be operated such that the minimum pressure drop across each control device is greater than or equal to 0.5 inches of water column, except during start-up and shutdown of the fans. The permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours of operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [R307-401-8] II.B.4.b.1 The permittee shall monitor the operating pressure drop across each drum filter and each baghouse along with the manufacturer's warranty. Records shall be maintained. [R307-401-8] II.B.5. FAM Operations Requirements II.B.5.a The permistions from the FAM raw material operation al tanks, curing oven, and treatment from	II.B.3.b	40 CFR 60, Appendix A, Method 10, or other EPA-approved testing method as acceptable to the
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operated and maintained in accordance with the manufacturer's specifications. The drum filters and baghouses shall be equipped with gauges or meters, which indicate the pressure drop across the control device. The pressure gauges or meters shall be located such that an inspector/operator can safely read the indicators at any time. The drum filters and baghouses, while in operation and venting to the atmosphere, shall be operated such that the minimum pressure drop across each control device is greater than or equal to 0.5 inches of water column, except during start-up and shutdown of the fans. The permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours of operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [R307-401-8]II.B.4.b.1The permittee shall monitor the operating pressure drop across each drum filter and each baghouse along with the manufacturer's warranty. Records shall be maintained. [R307-401-8]II.B.5FAM Operations RequirementsII.B.5.aThe emissions from the FAM raw material operational tanks, curing oven, and treatment from	II.B.4.a	The emissions from the assembled paper products A and B converting operation shall be routed to the assembled paper products drum filters and the assembled paper product baghouses.
baghouse once per operating day. [R307-401-8]II.B.4.b.2The permittee shall maintain an operating and maintenance log for each drum filter and each baghouse along with the manufacturer's warranty. Records shall be maintained. [R307-401-8]II.B.5FAM Operations RequirementsII.B.5.aThe emissions from the FAM raw material operational tanks, curing oven, and treatment from	II.B.4.b	operated and maintained in accordance with the manufacturer's specifications. The drum filters and baghouses shall be equipped with gauges or meters, which indicate the pressure drop across the control device. The pressure gauges or meters shall be located such that an inspector/operator can safely read the indicators at any time. The drum filters and baghouses, while in operation and venting to the atmosphere, shall be operated such that the minimum pressure drop across each control device is greater than or equal to 0.5 inches of water column, except during start-up and shutdown of the fans. The permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours of operation after replacement of the filter media on the drum filter or a bag(s) in the baghouse. The operating pressure drop shall be maintained within the
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II.B.5.a The emissions from the FAM raw material operational tanks, curing oven, and treatment from	II.B.4.b.2	The permittee shall maintain an operating and maintenance log for each drum filter and each baghouse along with the manufacturer's warranty. Records shall be maintained. [R307-401-8]
skid waste vents shall be routed to the RTO. [R307-401-8]	II.B.5.a	The emissions from the FAM raw material operational tanks, curing oven, and treatment from skid waste vents shall be routed to the RTO. [R307-401-8]

II.B.5.b	The RTO shall be preheated and maintain the Manufacturer's recommended temperature for ideal operation. [R307-401-8]
II.B.5.b.1	The permittee shall monitor and record the RTO's temperatures once per operating day. The RTO's temperatures shall be maintained within the design conditions specified by the manufacturer's performance warranty. The permittee shall maintain an operating and maintenance log for the RTO's. Continuous recording for the monitoring device is not required. [R307-401-8]
II.B.6	Emergency Generator Requirements
II.B.6.a	The owner/operator shall not operate each diesel-fired backup engine on site for more than 100 hours per rolling 12-month period during non-emergency situations. There is no time limit on the use of the engines during emergencies. [R307-401-8]
II.B.6.a.1	To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. Records documenting the operation of each diesel-fired backup engine shall be kept in a log and shall include the following:
	A. The date and time the diesel-fired backup engine was used
	B. The duration of operation in hours
	C. The reason for diesel-fired backup engine usage.
	[R307-401-8]
II.B.6.a.2	To determine the duration of operation, the owner/operator shall install a non-resettable hour meter for each diesel-fired backup engine. [R307-401-8]
II.B.6.b	The owner/operator shall only use diesel fuel (e.g., fuel oil #1, #2, or diesel fuel oil additives) as fuel in each diesel-fired backup engine. [R307-401-8]
II.B.6.b.1	The owner/operator shall only combust diesel fuel that meets a sulfur content of 15 ppm or less. [R307-401-8]
II.B.6.b.2	To demonstrate compliance with the 15 ppm requirement, the owner/operator shall maintain records of diesel fuel purchase invoices or obtain certification of sulfur content from the diesel fuel supplier. The diesel fuel purchase invoices shall indicate the diesel fuel requirements. [R307-401-8]

PERMIT HISTORY

This Approval Order shall supersede (if a modification) or will be based on the following documents:

Supersedes	DAQE-AN141070018-23 dated November 16, 2023
Is Derived From	NOI dated April 26, 2024
Incorporates	Additional Information dated September 11, 2024

ACRONYMS

The following lists commonly used acronyms and associated translations as they apply to this document:

10.077	
40 CFR	Title 40 of the Code of Federal Regulations
AO	Approval Order
BACT	Best Available Control Technology
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CDS	Classification Data System (used by Environmental Protection Agency to classify
	sources by size/type)
CEM	Continuous emissions monitor
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon monoxide Carbon Dioxide
CO_2	
CO_2e	Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98,
СОМ	Subpart A, Table A-1 Continuous opacity monitor
DAQ/UDAQ	Division of Air Quality
DAQ/ODAQ DAQE	This is a document tracking code for internal Division of Air Quality use
EPA	Environmental Protection Agency
FDCP	Fugitive dust control plan
GHG	Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i)
GWP	Global Warming Potential - Title 40 of the Code of Federal Regulations Part 86.1818-
0.01	12(a)
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
LB/YR	Pounds per year
MACT	Maximum Achievable Control Technology
MMBTU	Million British Thermal Units
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOI	Notice of Intent
NO _x	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM_{10}	Particulate matter less than 10 microns in size
$PM_{2.5}$	Particulate matter less than 2.5 microns in size
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
R307	Rules Series 307
R307-401	Rules Series 307 - Section 401
SO_2	Sulfur dioxide
Title IV	Title IV of the Clean Air Act
Title V	Title V of the Clean Air Act
TPY	Tons per year
UAC	Utah Administrative Code
VOC	Volatile organic compounds