

Commonwealth of Kentucky
Division for Air Quality
STATEMENT OF BASIS / SUMMARY

Title V, Operating
Permit: V-26-019

International Paper Company – Maysville Mill
Maysville, KY 41056

August 13, 2026
Sriram Balaji, Reviewer

SOURCE ID:	21-161-00032
AGENCY INTEREST:	3008
ACTIVITY:	APE20260001

Table of Contents

SECTION 1 – SOURCE DESCRIPTION	2
SECTION 2 – CURRENT APPLICATION.....	3
SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS	4
SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS	8
SECTION 5 – COMPLIANCE ASSURANCE MONITORING.....	9
SECTION 6 – PERMITTING HISTORY	10
SECTION 7 – PERMIT APPLICATION HISTORY.....	11
APPENDIX A – ABBREVIATIONS AND ACRONYMS	12

SECTION 1 – SOURCE DESCRIPTION

SIC Code: 2631, Paperboard Mills

Single Source Det. ☐ Yes ☒ No If Yes, Affiliated Source AI:

Source-wide Limit ☐ Yes ☒ No If Yes, See Section 4, Table A

28 Source Category ☐ Yes ☒ No If Yes, Category:

County: Mason

Nonattainment Area ☒ N/A ☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☐ Ozone ☐ Lead

PTE* greater than 100 tpy for any criteria air pollutant ☒ Yes ☐ No

If yes, for what pollutant(s)?

☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☒ VOC

PTE* greater than 250 tpy for any criteria air pollutant ☐ Yes ☒ No

If yes, for what pollutant(s)?

☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☐ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) ☐ Yes ☒ No

If yes, list which pollutant(s): *List the pollutant(s)*

PTE* greater than 25 tpy for combined HAP ☒ Yes ☐ No

*PTE does not include self-imposed emission limitations.

Description of Facility:

The Maysville Mill, which began operation in October 1992, produces recycled linerboard and corrugated medium from old corrugated container (OCC) via a twin-wire paper machine. The Mill consists of a Stock Preparation Area, Emission Unit 02 (EU 02), Paper Machine Area, EU 03, Wastewater Treatment Operations, EU 06 and miscellaneous storage tanks storing small amounts of various process chemicals listed on the permit as insignificant activities. Two small, (< 500 HP) emergency, compression ignition, diesel engines, EU 04 and EU 05 provide power for a fire water pump and a Wastewater Treatment Operations emergency power generator, respectively. The majority of the air emissions are released in the stock preparation and paper machine areas. Emissions from the Maysville Mill consist of mainly of particulate matter (PM), Volatile Organic Compounds (VOC), various hazardous air pollutants (HAP) and methane (CH₄).

SECTION 2 – CURRENT APPLICATION

Permit Number: V-26-019

Activities: APE20260001

Received: 3/10/2026

Application Complete Date(s): 4/13/2026

Permit Action: ☐ Initial ☒ Renewal ☐ Significant Rev ☐ Minor Rev ☐ Administrative

Construction/Modification Requested? ☐ Yes ☒ No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action ☐ Yes ☒ No

Description of Action:

Renewal of Title V Operating Permit V-20-009.

V-26-019 Emission Summary		
Pollutant	2024 Actual (tpy)	PTE V-26-019 (tpy)
CO	0.04	0.735
NOx	0.11	2.02
PT	18.26	29.26
PM ₁₀	18.26	29.26
PM _{2.5}	18.26	29.26
SO ₂	0.13	0.243
VOC	80.39	128.61
Lead	-	-
Greenhouse Gases (GHGs)		
Carbon Dioxide	7.19	136.293
Methane	2,827	2,857
Nitrous Oxide	0.00006	.001
CO ₂ Equivalent (CO ₂ e)	79,163	80,141
Hazardous Air Pollutants (HAPs)		
Combined HAPs:	N/A	27.24
Acetaldehyde	3.35	5.34
Benzene	4.0 E-5	7.8 E-4
Biphenyl	1.06	1.702
Carbon Disulfide	0.51	1.623
Formaldehyde	2.74	4.395
Methanol	6.09	9.737
Methylene Chloride	0.87	1.41
Naphthalene	0.003	0.001
Phenol	0.99	1.506
Propionaldehyde	0.88	1.365
Toluene	0.086	0.139
Xylenes (Total)	8.0 E-6	2.3 E-4

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Unit 002 (SP1-SP3, SP5-SP9) Pulping and Stock Preparation Area EU-02 Emission Unit 003 (SP4, SP4A PM1-PM28) Paper Machine Area EU-03				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
PM	$E=2.34$, for $P \leq 0.5$ tph; $E=3.59P^{0.62}$, for $P > 0.5$ and ≤ 30 tph; $E=17.31P^{0.16}$, for $P > 30$ tph Where, E= rate of emission in lb/hr and P = process weight in tons/hr	401 KAR 59:010, Section 3(2)	NCASI Tech Bulletin 737 Table 5-6 pg. 41	Compliance assumed based on emission factor provided.
	Opacity shall not exceed 20%	401 KAR 59:010, Section 3(1)(a)	NA	Qualitative visual observation monthly
Initial Construction and Modification Date: 1991, Modified 2015 EU02 Process Description (SP1-SP3, SP5-SP9): Old Corrugated Container (OCC) pulping, pulped stock cleaning, base-ply sheet stock decker and thickening, and top-ply sheet thermal treatment, stock decker and thickening. Addition of a third pulping line: 2015 Capacity: 2,280 machine dry tons (MDT) of paper per day on a monthly average for the entire facility Control Device: None EU03 Process Description (SP4, PM1-PM26): Feeding of the base-ply and top-ply stock, forming of the sheet, moisture removal (via vacuums, pressure and steam), and winding of sheet onto reels, and rewinding of sheet onto rolls. Modifications and upgrades increasing the speed of the paper machine: 2015 Total Capacity: 2,280 machine dry tons of paper per day on a monthly average. Control Device: None Applicable Regulation: 401 KAR 50:012, General application. The source identified 401 KAR 50:012 as an applicable regulation pursuant to Section 1.(2) which states “In the absence of a standard specified in these administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical.” The potential to emit (PTE) of VOC for this facility is 128.4 tons per year (tpy). However, the Paper Machine Area is the largest source of VOC emissions (123.4 tpy) and has no dedicated stack through which the VOC is emitted. It is housed in the main building along with the Pulping and Stock Preparation process. This building has many ventilation exhausts with very high flowrates and relatively small (1 to 5 ppm) VOC concentrations that spread over the entire structure (similar to a warehouse). Therefore, no VOC				

Emission Unit 002 (SP1-SP3, SP5-SP9) Pulping and Stock Preparation Area EU-02
Emission Unit 003 (SP4, SP4A PM1-PM28) Paper Machine Area EU-03

control is reasonable available or practical. A search of the EPA RACT/BACT/LAER Clearinghouse was conducted and it concludes that VOC control, in a case like this, is not technically feasible.

401 KAR 59:010, *New process operations.*

401 KAR 59:010 is applicable to each affected facility, associated with a process operation, which is not subject to another emission standard with respect to particulates, commenced on or after July 2, 1975. This regulation only applies to the Paper Machine Area.

State-Origin Regulations

401 KAR 63:020, *Potentially hazardous matter or toxic substances.*

401 KAR 63:020 is applicable to each affected facility that emits hazardous matter or toxic substances. Both the Stock Preparation Area and the Paper Machine Area both emit these substances and are therefore subject to 401 KAR 63:020.

Comments:

Emission factor for PM was taken from Table 5.1 of Technical Bulletin No 942 for Linerboard sources. Emission factors for HAPs and VOC are based on NCASI data converted to lb/MDT basis at 7% moisture MDT: machine dried tons of paper.

SP7- through SP-11 identified in the previous renewal application as part of the expansion project were never implemented as planned and hence the changes to EU-02 and EU-03.

40 CFR 63, Subpart S is not applicable to EU 02 and EU03. Although International Paper is a major source of HAPs and satisfies the applicability statement of 40 CFR 63.440(a)(3), there are no affected sources under CFR 63.440(b)(2) as the facility does not use a bleaching system for any of their products.

Emission Unit 004: Emergency Fire Pump Engine EU-04

Initial Construction Date: 1992

Process Description:

Cummins Diesel Model 6BTA5.9-F1; 208 hp (204KW), 6 cyl, 5.9 L displacement, 10.6 gal/hr fuel cons.

Fuel: Diesel fired

Type: Compression ignition RICE

Manufacture Date: Pre-1992

Applicable Regulation:

401 KAR 63:002, Section 2(4)(eeee), 40 C.F.R. 63.6580 through 63.6675, Tables 1A through 8 and Appendix A, (**Subpart ZZZZ**), *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines located at major sources of HAP emissions*

Comments:

The existing fire pump engine is subject to the requirements from Table 2c of 40 CFR 63, Subpart ZZZZ. The fire pump engine is not subject to requirements of 40 CFR 60, Subpart IIII due to the construction date of the engine preceding July 11th 2005.

Emission Unit 005: Waste Water Treatment Operations Emergency Generator Engine EU-05				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
NO _x + NMHC	4.0 g/KW-hr	40 CFR 60.4202(a)(1)(ii)	Engine Spec Sheet	By purchasing a Tier III certified engine and configuring/installing based on the manufacturer specifications
CO	3.5 g/KW-hr			
PM	0.20 g/KW-hr			
Initial Construction Date: 2007				
Process Description: Caterpillar model D175; 274 hp; 175 EkW generator set (or equivalent), U.S EPA Certified (Tier III) Fuel: Diesel Type: Compression ignition RICE; 6 cyl (7.01 L displacement) Date installed: 2015, Date manufactured: After 2007.				
Applicable Regulation: 401 KAR 63:002, Section 2(4)(eeee), 40 C.F.R. 63.6580 through 63.6675, Tables 1A through 8 and Appendix A, (Subpart ZZZZ), <i>National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines located at major sources of HAP emissions</i>. The source may comply with requirements of Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII. No further requirements apply to the unit under 40 CFR 63. 401 KAR 60:005, Section 2(2)(oooo), 40 C.F.R. 60.4200 through 60.4219, Tables 1 through 8, (Subpart IIII), <i>Standards of Performance for Stationary Compression Ignition Internal Combustion Engines</i> applies because the permittee commenced construction after July 11, 2005 and the stationary CI ICE was manufactured after April 1, 2006.				
Comments: Emissions Factors for CO, NO_x, VOC, and PM are all derived from the engine spec sheet (located under APE20260001). The VOC- NO_x split was determined using the ratio between the two pollutants in AP 42 Table 3.3-1. The SO₂ EF is from AP 42 Table 3.3-1 with HAP emissions from table 3.3-2. All GHG emissions are from Table C-1 to 40 CFR 98 Subpart C.				

Emission Unit 006: Wastewater Treatment Operations EU-06

Initial Construction Date: 1991

Process Description:

Two 7.1 million gallon anaerobic ponds and one 7.4 million gallon aerobic pond.

State-Origin Regulations

401 KAR 63:020, *Potentially hazardous matter or toxic substances.*

Comments:

GHG emissions are calculated using the methodology specified in 40 CFR 98 Subpart II – Industrial Wastewater treatment. This emission unit has trace amounts of organic and H₂S emissions hence the application of 401 KAR 63:020. These emissions cannot be quantified and, therefore, are not accounted for within the emissions inventory.

Emission Unit 07: Parts Washers in Maintenance Shops EU-07

Initial Construction Date: 1991

Process Description:

Three (3) small cold parts washers in the maintenance shops – All cold cleaners use Crystal Clean 106+ Mineral Spirits.

1. Maintenance Shop Cold Cleaner – Cleaner area: 14.84 ft²
2. Mobile Shop Cold Cleaner – Cleaner area: 14.84 ft²
3. Environmental Building Cold Cleaner – Cleaner area: 8.19 ft²

Applicable Regulations:

401 KAR 59:185, *New solvent metal cleaning equipment.*

Comments:

There are 3 parts washers at the Mill and each meets the definition of a cold cleaner. Based on the solvent used which has a vapor pressure of <1mmHg, the units are subject to Section 4 of 401 KAR 59:185.

Emission factor for VOC emissions are based on AP-42, Chapter 4.6, Table 2 and using a safety margin of 30%.

Testing Requirements/Results

N/A

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

N/A

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 59:010 , <i>New process operations.</i>	002, 003
401 KAR 63:020 , <i>Potentially hazardous matter or toxic substances.</i>	002, 003, 006
401 KAR 50:012 , <i>General application.</i>	002, 003
401 KAR 59:185 , <i>New solvent metal cleaning equipment.</i>	07
401 KAR 60:005, Section 2(2)(oooo) , 40 C.F.R. 60.4200 through 60.4219, Tables 1 through 8 , (Subpart IIII), <i>Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.</i>	005
401 KAR 63:002 Section 2(4)(eeee) , 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (Subpart ZZZZ) <i>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.</i>	004, 005

Table C - Summary of Precluded Regulations:

N/A

Table D - Summary of Non Applicable Regulations:

N/A

Air Toxic Analysis

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*

The Division for Air Quality (Division) has performed AERMOD 13.0.0 on September 4, 2026 of potentially hazardous matter or toxic substances (Acetaldehyde, Biphenyl, Carbon Disulfide, Formaldehyde, Methanol, Phenol, Propionaldehyde, Toluene) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the conditions outlined in the permit will assure compliance with the requirements of 401 KAR 63:020.

Single Source Determination

N/A

SECTION 5 – COMPLIANCE ASSURANCE MONITORING

40 CFR 64, *Compliance assurance monitoring* (CAM) applies to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 CFR 64.2(b)(1);
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

Emission Unit	Criteria 1 (Y/N)	Criteria 2 (Y/N)	Criteria 3 (Y/N)	Does CAM apply? If Y for criteria 1, 2, AND 3, then Yes, Otherwise, No.
002	N	N	N	No
003	N	N	Y	No
004	N	N	N	No
005	Y	N	N	No
006	N	N	N	No
07	N	N	N	No

* If Yes, CAM applies for any of the emission units above, then see further clarification for each listed emission unit in **Section 3**.

SECTION 6 – PERMITTING HISTORY

Permit	Permit Type	Activity #	Complete Date	Issuance Date	Summary of Action	PSD/Syn Minor
F-09-051	Renewal	APE20090001	1/20/2010	4/1/2010	Operating Permit	N/A
F-09-051 R1	Admin Amendt	APE20100002	9/16/2010	10/4/2010	Amendment of Permit Cover Page	N/A
F-09-051 R2	Admin Amend	APE20120001	3/09/2012	3/9/2012	Name Change	N/A
V-15-014	Initial Title V	APE20140001	3/06/2015	9/15/2015	Initial Title V	N/A
V-20-009	Renewal	APE20200001	5/11/2020	9/12/2021	Operating Permit	N/A

SECTION 7 – PERMIT APPLICATION HISTORY
N/A

APPENDIX A – ABBREVIATIONS AND ACRONYMS

AAQS	– Ambient Air Quality Standards
BACT	– Best Available Control Technology
Btu	– British thermal unit
CAM	– Compliance Assurance Monitoring
CO	– Carbon Monoxide
Division	– Kentucky Division for Air Quality
ESP	– Electrostatic Precipitator
GHG	– Greenhouse Gas
HAP	– Hazardous Air Pollutant
HF	– Hydrogen Fluoride (Gaseous)
MSDS	– Material Safety Data Sheets
mmHg	– Millimeter of mercury column height
NAAQS	– National Ambient Air Quality Standards
NESHAP	– National Emissions Standards for Hazardous Air Pollutants
NO _x	– Nitrogen Oxides
PM	– Particulate Matter
PM ₁₀	– Particulate Matter equal to or smaller than 10 micrometers
PM _{2.5}	– Particulate Matter equal to or smaller than 2.5 micrometers
PSD	– Prevention of Significant Deterioration
PTE	– Potential to Emit
SO ₂	– Sulfur Dioxide
TF	– Total Fluoride (Particulate & Gaseous)
VOC	– Volatile Organic Compounds
MMBtu/hr	– million BTU per hour