

STATEMENT OF BASIS

For the issuance of Air Permit # 1306-AR-17 AFIN: 60-00915

1. PERMITTING AUTHORITY:

Division of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Kimberly-Clark Corporation
500 Murphy Drive
Maumelle, Arkansas 72113

3. PERMIT WRITER:

Amanda Leamons

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Nonwoven Fabric Mills
NAICS Code: 313230

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
8/26/2025	Modification	Revised all coform lines emissions limits to account for the number of process vents routed to the lines. SNs- 02, 03, 06, 07, 09 - 11, 13 - 15, and 26 - 29

6. REVIEWER'S NOTES:

Kimberly-Clark Corporation owns and operates an infant care product manufacturing facility (NAICS 313230) located at 500 Murphy Drive in Maumelle, AR. This permit revision includes a modification to revise the VOC emission limit for Coform Process Line 2 Baghouse (SN-13) and to revise the PM/PM₁₀ emission limits for the Coform Process Lines 1, 2, and 3 sources, SNs-02, 03, 06, 07, 09 through 11, 13 through 15, and 26 through 29 based on the number of the

number of process streams routed to the sources. In addition, the specific conditions for the emergency engines subject to NSPS Subpart JJJJ and IIII were updated and the permit formatting and rule citations were updated. The permitted changes will result in overall annual permitted emission rate limit increases of 15.8 tons of PM/PM₁₀ and 0.8 ton of VOC.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

Currently there are no active/pending enforcement actions or recent compliance issues.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? NA

b) Is the facility categorized as a major source for PSD? N

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
23	N/A	NSPS Subpart JJJJ
24	N/A	NSPS Subpart IIII

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
NONE				

11. PERMIT SHIELD – TITLE V PERMITS ONLY: NA

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY: NA

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

The non-criteria pollutants listed below were evaluated. Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Formaldehyde	0.1228	0.01351	0.00412	Y
POM	0.2	0.022	4.81E-06	Y
Arsenic	0.01	0.0011	1.3E-05	Y
Barium	0.5	0.055	2.6E-05	Y
Beryllium	0.00005	5.5E-06	9.0E-07	Y
Cadmium	0.002	0.00022	6.0E-05	Y
Chromium	0.5	0.055	7.7E-05	Y
Cobalt	0.02	0.0022	4.6E-06	Y
Copper	0.2	0.022	5.1E-06	Y
Lead	0.05	0.0055	1.8E-05	Y
Manganese	0.02	0.0022	2.1E-05	Y

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Mercury	0.01	0.0011	1.4E-05	Y
Molybdenum	0.5	0.055	6.6E-06	Y
Nickel	0.1	0.011	1.2E-04	Y
Selenium	0.2	0.022	1.3E-06	Y
Vanadium	0.05	0.0055	1.4E-05	Y

Modeling conducted with previously revision – no NCAPs emissions increased with R15 – R17 modifications.

c) H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards

N

If exempt, explain: No H₂S emissions permitted

15. CALCULATIONS:

SN	Emission Factor Source	Emission Factor	Control Equipment	Control Equipment Efficiency	Comments
02, 03, 06, 09-11, 14, 15, & 26-28	PM Stk Test June 2021 (SN-26) VOC Stk Test Feb 2023 (SN-27)	*confidential			
07,13, & 29	PM & VOC Stack Test Feb 2023 (SN-29)	*confidential			
21 & 22	Dust Throughput reduced by control efficiency	N/A	Baghouse	99.5%	From Prior Permit
23	AP-42 3.2-3 & MFG Specs	0.0095 lb _{PM} /PM ₁₀ /MMBtu 5.88E-4 lb _{SO2} /MMBtu 1.0 g _{VOC} /hp-hr 0.95 g _{CO} /kW-hr 0.39 g _{NOX} /kW-hr	None	N/A	1,500 hrs/yr 259hp SI-RB Emergency Generator

SN	Emission Factor Source	Emission Factor	Control Equipment	Control Equipment Efficiency	Comments
24	AP-42 3.3-1	1.0E-4 lb _{PM/PM10} /hp-hr 2.05E-3 lb _{SO2} /hp-hr 2.47E-3 lb _{VOC} /hp-hr 6.68E-3 lb _{CO} /hp-hr 0.031 lb _{NOX} /hp-hr	None	N/A	250 hrs/yr 420hp CI
30-43	AP-42, 1.4	7.6 lb _{PM/PM10} /10 ⁶ scf 100 lb _{NOx} /10 ⁶ scf 84 lb _{CO} /10 ⁶ scf 0.6 lb _{SO2} /10 ⁶ scf 5.5 lb _{VOC} /10 ⁶ scf 0.0005 lb _{Pb} /10 ⁶ scf	None	N/A	Natural Gas Fuel

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
02, 03, or 06 And 07 THEN 10, 11, 14, or 15 And 13	PM	EPA Method 5	One-time unless there is a test failure. In the case of failure- test annually until 2 consecutive passing tests.	Reduced emission limit to below previously tested levels on this line. Need to verify emissions on older line.
02, 03, or 06 And 07 THEN 10, 11, 14, or 15 And 13	VOC	EPA Method 25a	One-time unless there is a test failure. In the case of failure – test annually until 2 consecutive passing tests.	Reduced emission limit to below previously tested levels on this line. Need to verify emissions on older line.

17. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
N/A				

18. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
Facility	Throughput	R16 Application confidential throughput	Monthly	N
23	Hours of Operation	1,500 per year	Monthly	N
	Maintenance Records and Notifications	See Specific Conditions 18 & 20	-	-
	Type of Operation	See Specific Conditions 20 & 22	-	-
24	Hours of Operation	250 per year	Monthly	N
	Type of Operation	See Specific Condition 31-33	-	Y, only if used for financial arrangement 31.c.i
	Engine Manufacturer Data	See Specific Condition 29	-	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02, 03, 06, 07, 09-11, 13-15, 21-23, 25-43	5%	§19.503	Inspector Observation
24	20%	§19.503	Inspector Observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
9	SN-27 has been re-tested per the CAO and passed

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
N/A								

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22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1306-AR-16

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Minor Source

Revised 03-11-16

Facility Name: Kimberly-Clark
 Corporation
 Permit Number: 1306-AR-17
 AFIN: 60-00915

			Old Permit	New Permit
\$/ton factor	28.14	Permit Predominant Air Contaminant	88.5	89.3
Minimum Fee \$	400	Net Predominant Air Contaminant Increase	0.8	
Minimum Initial Fee \$	500			
Check if Administrative Amendment	<input type="checkbox"/>	Permit Fee \$	<u>400</u>	
		Annual Chargeable Emissions (tpy)	<u>89.3</u>	

Pollutant (tpy)	Old Permit	New Permit	Change
PM	9.1	24.9	15.8
PM ₁₀	9.1	24.9	15.8
PM _{2.5}	0	0	0
SO ₂	1.7	1.7	0
VOC	88.5	89.3	0.8
CO	11.7	11.7	0
NO _x	21.1	21.1	0
Lead	0.00011	0.00011	0
Total HAPs	0.55	0.55	0