

**Statement of Basis
International Paper – Riverdale Mill
Facility No. 104-0003
Significant Title V Modification**

Introduction

The Department received an application on February 20, 2026, from International Paper - Riverdale Mill (IPR or the Mill) for a proposal to modify their Title V Major Source Operating Permit to reevaluate the compliance methods for the pulping process condensate standards required under 40 CFR Part 63, Subpart S, National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry. An updated application was received on April 22, 2026. The Mill is anticipating the completion of modifications to the No. 16 Paper Machine (PM16) in calendar year 2026. Air Permits 104-0003-Z014 and Z029 were issued on April 4, 2022, for this project and construction began in January 2024. Following the modifications, the Mill would process only unbleached pulp on PM16 while being able to process both bleached and unbleached pulp on the No. 15 Paper Machine. IPR currently complies with the process condensate standards for mills that produce bleached pulp under 40 CFR Part 63, Subpart S. However, following the conversion of PM16 to process unbleached pulp, the Mill would be able to prorate the process condensate standards as described in 40 CFR §63.446(i). The Mill will continue to demonstrate compliance with Subpart S as before the modification, only the numerical standard will change based on the calculated prorated production values. The Mill's current Title V permit was issued on February 15, 2023, and expires on February 14, 2028. There will be no increase in potential emissions as part of this Title V modification.

The Mill has proposed the following revisions and conditions to the Title V permit:

Process Condensates

- Update the Emission Limits in the Informational Summary page table to reflect the unbleached collection and treatment standards and the option to prorate these standards based on the ratio of annual bleached and unbleached production values.
- Add the unbleached collection and treatment standards and the option to prorate these standards based on the ratio of annual bleached and unbleached production values to Emission Standard provisos 2 and 5.
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Title V Modification

The proposed changes should be classified as a significant modification to the Title V permit. A 30-day public comment period and a 45-day EPA comment period would be required. The modifications would be incorporated into the Title V permit upon completion of the EPA review.

Recommendations

I recommend that International Paper - Riverdale Mill's Title V permit be modified as attached.



Steven Bissey
Industrial Chemicals Section
Chemical Branch

April 28, 2026

Date