



NARRATIVE

TO: Jeng-Hon Su
FROM: Dawn Wu
DATE: January 16, 2026

Facility Name: **International Paper Company**
AIRS No.: 089-00227
Location: Tucker, GA (DeKalb County)
Application #: 30001
Date of Application: December 23, 2025

Background Information

International Paper Company (hereinafter “facility”) is located in Tucker, Georgia, in DeKalb County. The facility is a flexographic printing facility. International Paper Company is currently operating under Synthetic Minor Permit No. 2759-089-0227-S-06-0 issued on March 30, 2021.

The facility has two flexographic presses and a plate making operation. Paper roll stock is printed flexographically to make pre-printed liner board for use in the manufacture of corrugated boxes. Other manufacturing processes include making flexographic printing plates, plate drying, solvent recycling, water-based ink blending, and paper coating.

Purpose of Application

On December 23, 2025, International Paper Company submitted an application to request the replacement of the existing distiller and inliner with the new distiller and inliner for the miscellaneous manufacturing process (Emissions Unit ID E2).

E2 includes flexographic plate making, plate drying, solvent recycling, and ink blending. The process starts with the plate making process, also known as the inliner. The designs received by the facility are transferred into photopolymer plates using a precision laser system. The plate is then exposed to ultraviolet (UV) light, which cures the areas not masked by the image, hardening the polymer in those regions. The plate is then placed into a processor where unexposed areas are removed using a combination of chemical solutions and mechanical brushes, effectively clearing away uncured polymer. The plate is then moved to a drying unit to evaporate residual chemicals, ensuring the plate is clean and dry. Finally, the plate undergoes a finishing exposure under specialized UV lights. This final cure enhances plate stability and eliminates any remaining tackiness, preparing it for use in production.

The used chemical solution and unexposed polymer are transferred to a distillation unit for processing. The mixture is heated, causing the chemical components to evaporate. As the vapor rises, it passes through a heat exchanger where it is cooled and condensed back into its liquid chemical form. The remaining sludge, consisting of used polymer, is collected in a barrel and sent to Safety-Kleen for disposal, where it is

repurposed as biofuel. The recovered chemical is returned to a holding tank, where it is tested and rebalanced for reuse in the production process. The existing distiller unit does not have controls and includes external vents that emit to the atmosphere.

The Public Advisory started on February January 7, 2026, and expired on February 6, 2026.

Equipment List

Emission Units			Associated Control Devices	
Source Code	Description	Installation Date	Source Code	Description
P1	Flexographic Printing Press 1	existing	n/a	n/a
P3	Flexographic Printing Press 3	existing	n/a	n/a
E2	Miscellaneous Manufacturing Processes include flexographic plate making, plate drying, solvent recycling, ink blending, etc.	existing	n/a	n/a

Emissions Summary

The replacement distiller will operate as a closed system with no vents, meaning no emissions will be emitted to the atmosphere. Since the replacement distiller operates as a closed system, post-Project emissions from E2 are quantified solely based on the solvent usage from the inliner. Since the new inliner is not going to increase the production, and the facility will keep the VOC emission limits specified in existing Conditions 2.1 and 2.2 unchanged, the proposed modification is not expected to cause any potential emission increases.

Facility-Wide Emissions (in tons per year)

Pollutant	Potential Emissions			Actual Emissions		
	Before Mod.	After Mod.	Emissions Change	Before Mod.	After Mod.	Emissions Change
PM/PM ₁₀ /PM _{2.5}	0.07	0.07	0	<0.07	<0.07	0
NO _x	0.89	0.89	0	<0.89	<0.89	0
SO ₂	0.005	0.005	0	<0.005	<0.005	0
CO	0.74	0.74	0	<0.74	<0.74	0
VOC	<65.9	<65.9	0	30.21	36.39	6.18
Max. Individual HAP	<10	<10	0	0.31	0.31	0
Total HAP	<25	<25	0	0.51	0.51	0
Total GHG (if applicable)	1,069	1,069	0	1,042	1,042	0

Regulatory Applicability

Unchanged. There will be no new federal and state rules required for this permit amendment.

Permit Conditions

Unchanged. There will be no new conditions required for this permit amendment.

Toxic Impact Assessment

Since the proposed modification will not cause any potential emission increases, no toxic impact assessment is required for this modification.

Summary & Recommendations

International Paper Company in Tucker is considered a synthetic minor source due to the 65.9-tpy facility-wide emission limit on VOC, 25 tpy emission limit on combined HAPs and 10 tpy emission limit on any single HAP. The Public Advisory expired on February 6, 2026. No comments were received. As a synthetic minor source, compliance responsibility is assigned to SSCP. I recommend issuance of Air Permit Amendment No. 2759-089-0227-S-06-1 to the International Paper Company in Tucker.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//