

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: 05 2007 - 011 Project Number: 2007-02-024

Parent Company: The Procter & Gamble Company

Parent Company Address: 2 P&G Plaza, Cincinnati, OH 45202

Installation Name: The Procter & Gamble Paper Products Company

Installation Address: 14484 State Highway 177, Jackson, Missouri 63755

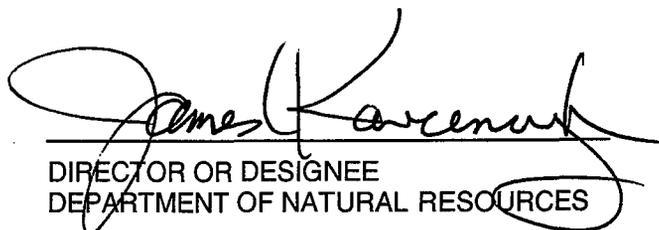
Location Information: Cape Girardeau County, S5, T32, R14

Application for Authority to Construct was made for:
Modification of Papermachines 5G, 6G, & 7G. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

-
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

MAY 29 2007

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

STATE OF MISSOURI



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Permit No.	
Project No.	2007-02-024

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

The Procter & Gamble Paper Products Company
Cape Girardeau County, S5, T32, R14

1. Stack Testing Requirements – 7G or 6G Papermachine
 - A. The Procter & Gamble Paper Products Company (P&G) shall conduct performance testing to quantify the emission rates of particulate matters less than 10-micron in diameter (PM₁₀) from the wet end (Forming Section) and dry end (Dry End) of the 7G or 6G Papermachine. These tests shall be done in accordance with the procedures outlined below.
 - B. A completed Proposed Test Plan (form enclosed) must be submitted to the Air Pollution Control Program at least 30 days prior to the proposed test date of any such performance tests so that a pretest meeting may be arranged, if necessary, and to assure that the test date is acceptable for an observer to be present. The Proposed Test Plan must include specification of test methods to be used and be approved by the Director prior to conducting the required emissions testing.
 - C. Within 60 days of achieving the maximum production rate of the modified papermachine, the owner/operator shall have conducted the required performance tests.
 - D. Any required performance testing shall be conducted during periods of representative conditions and should also be conducted at the maximum process/production rates or within ten percent (10%) of this stated capacity, not to include periods of start-up, shutdown, or malfunction. However, if performance testing is conducted at a production rate which is less than 90% of the maximum stated capacity of the equipment, then ten percent (10%) above the production rate at which the performance test was conducted shall become the new maximum allowable hourly production rate for the unit.
 - E. Two (2) copies of a written report of the performance test results must be submitted to the Director within 90 days of completion of the performance testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required Environmental Protection Agency (EPA) Method for at least one

Page No.	4
Permit No.	
Project No.	2007-02-024

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- (1) sample run for each air pollutant tested.
 - F. No later than thirty (30) days after the performance test results are submitted, P&G shall provide the Director with a report that establishes the potential emissions of PM₁₀ tested in Special Conditions No. 1.A. This report shall report the potential emission rates in pounds per hour, tons per year, pounds per ton of material feed and pounds per ton of material produced from the modified system in order that the Air Pollution Control Program may verify the potential emissions from this project.
 - G. If the results of the performance testing shows that the emission rates for PM₁₀ are greater than those used in the emissions analysis herein, then P&G shall evaluate what effects these higher emission rates would have had on the permit applicability of this project. P&G shall submit the results of any such evaluation in 30 days for Air Pollution Control Program review and approval.
 - H. The above time frames associated with this performance testing condition may be extended upon request of P&G and approval by the Director.
2. Control Device Requirement – Cyclones
 - A. Cyclones must be used to control emissions from the forming sections of the 5G, 6G, and 7G papermachines. The cyclones must be in use at all times when these papermachines are in operation, except during the start-up or shutdown period, and shall be operated and maintained in accordance with the manufacturer's specifications and recommendations, and any locally prepared operating procedures.
 - B. P&G shall maintain an operating and maintenance log for the each cyclone that shall include the following:
 - 1) Incidents of malfunction: with impact on emissions, duration of event, probable cause and corrective actions.
 - 2) Maintenance activities: with inspection schedule, repair actions and replacements, etc.
 - 3) Records may be kept in either written or electron form.
 3. Control Device Requirement – Scrubbers
 - A. Scrubbers must be used to control emissions from the dry end of the 5G, 6G, and 7G papermachines. The scrubbers shall be operated and maintained in accordance with the manufacturer's specifications and recommendations, and any locally prepared operating procedures.

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Permit No.	
Project No.	2007-02-024

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- B. Scrubbers shall be equipped with a flow meter that indicates the flow through the scrubbers. These meters shall be located in such a way they may be easily observed by Department of Natural Resources' employees.
- C. P&G shall monitor and record the flow rate through the scrubbers at least once every twenty-four (24) hours. The flow rate shall be maintained within the design conditions specified by the manufacturer's performance warranty.
- D. P&G shall maintain an operating and maintenance log for the scrubbers which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
 - 3) A written record of regular inspection schedule, the date and results of all inspections including any actions or maintenance activities that result from that inspection.
 - 4) Records may be kept in either written or electronic form.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2007-02-024
Installation ID Number: 031-0053
Permit Number:

The Procter & Gamble Paper Products Company
14484 State Highway 177
Jackson, MO 63755

Complete: February 9, 2007
Reviewed: March 9, 2007

Parent Company:
The Procter & Gamble Company
2 P&G Plaza
Cincinnati, OH 45202

Cape Girardeau County, S5, T32, R14

REVIEW SUMMARY

- The Procter & Gamble Paper Product Company has applied for authority to modify their existing Papermachines 5G, 6G, and 7G.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. However, HAP emissions are expected to be insignificant.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- Existing cyclones and scrubbers are being used to control the particulate matter emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ and VOC from the project are above de minimis level. Emissions of PM₁₀ and VOC are below de minimis levels based on the actual-to-potential test per 40 CFR 52.21.
- This installation is located in Cape Girardeau County, an attainment area for all criteria air pollutants.
- This installation is on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed for this review. Ambient air quality

modeling was not performed for PM₁₀ and VOC since the actual-to-potential emissions of the application are below de minimis levels. Furthermore, no Screen 3 model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions.

- Emissions testing is required for the equipment/source.
- A revision to the Part 70 Operating Permit is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

The Procter & Gamble Paper Product Company (P&G) operates a sanitary disposable paper products manufacturing facility at Cape Girardeau, Missouri. This installation is considered an existing major source.

A Part 70 Operating Permit was issued by the Air Pollution Control Program on February 28, 2005. The following construction permits have been issued to P&G from the Air Pollution Control Program.

Table 1: Previous Construction Permits

Permit Number	Description
0881-002A	Diaper production equipment
0585-003	Processes D and E, converting process
0785-003	Process F
0487-010	Modification of Processes C and E
1292-017	Delivery system for raw materials
0695-021	Increase in capacity of Process B
0198-037	PSD papermaking process
1198-023	Temporary boiler
0999-020	Diaper production lines
032002-009	Diesel generators and pumps
042002-003	Diaper lines
102002-019	Bleach usage
032003-041	A Section (8) modification of Permit Number 0198-037 and installation of two (2) new air handling units, an emergency generator, and four (4) natural gas-fired space heaters
112004-010	Addition of four (4) new diaper lines and one absorbent delivery system
052006-004	Construction of three (3) new diaper lines.

PROJECT DESCRIPTION

P&G proposed to increase capacity of the three existing papermachines (5G, 6G, and 7G). Papermachines 5G, 6G, and 7G will receive blade upgrades, a calendar upgrade, and vacuum box optimization in order to increase the capacity. 5G and 6G will also receive an air foil.

Each papermachine consists of a wet end (Forming Section) and a dry end(Dry End). The vacuum box optimization will affect particulate emissions from the Forming Section. The calendar upgrade on each machine will affect the Dry End emissions. The emissions associated with the burners for the papermachines are not included in this project since burners will not be modified and they are permitted at their maximum capacity in Permit Numbers 0198-037 and 032003-041.

P&G requested that the production throughputs, the maximum design rates, and the process flow diagrams submitted in this application to be treated as confidential. These items were identified as “Confidential.” The company believes that the information identified as confidential has competitive value because access to data would put the company at a competitive disadvantage.

SIGNIFICANT EMISSIONS INCREASE DETERMINATION

Potential emissions of PM₁₀ and VOC from the project are above de minimis levels, which are also the major source threshold for major source. Since this project is a modification of existing emissions units, the emissions increase of PM₁₀ and VOC are determined by calculating the difference between the projected actual emissions and the baseline actual emissions. The facility has the option of using potential emissions in place of projected actual emission in order to avoid the recordkeeping requirements. P&G has proposed to use the potential to actual applicability test for this project. The baseline actual emissions can be determined by using any consecutive 24-month period in the past 10 years. P&G has requested to use July 2004 to June 2006 for all three units. Potential emissions of the application represent the potential of the proposed modified equipment, assuming continuous operation (8760 hours per year).

Table 2: PM₁₀ Actual-to-Potential Evaluation

Emission Points Information	Current Emission Rate* (lb/hr)	Baseline Actual Emissions (tons/yr)	New Potential Emissions (tons/yr)	Potential – Baseline Actual (tons/yr)
1GFR: 5G Papermachine Former Equipment	0.46	1.74	3.77	2.02
1GDE: 5G Dry End	0.3	1.14	1.45	0.31
2GFR: 6G Papermachine Former Equipment	0.45	1.60	3.77	2.17
2GDE: 6G Dry End	0.24	0.85	1.18	0.33
3GFR: 7G Papermachine Former Equipment	0.66	1.71	3.77	2.06
3GDE: 7G Dry End	0.3	0.78	1.49	0.71
	Sum of Potential - Baseline Actual Emissions:			7.61

*Current emission rates are based on emission testing.

Table 3: VOC Actual-to-Potential Evaluation

Emission Points Information	Baseline Actual Emissions (tons/yr)	New Potential Emissions (tons/yr)	Potential – Baseline Actual (tons/yr)
5G Papermachine	36.74	39.33	2.59
6G Papermachine	21.95	25.10	3.15
7G Papermachine	10.99	12.31	1.32
Sum of Potential - Baseline Actual Emissions:			7.06

This project is not considered to be a major modification, according to the actual-to-potential-test per 40 CFR 52.21.

EMISSIONS/CONTROLS EVALUATION

PM₁₀ and VOC are the emission of concern from this project. The emission factors for PM₁₀ used in this analysis were developed based on the emission testing performed on these papermachines. Papermachines 5G and 6G will be modified to resemble 7G’s existing Forming Section. P&G used a 30% safety factor for future emissions of all three machines. For the Dry End, P&G is using a conservative estimate by assuming that the particulate emissions will increase linearly with any increase in capacity. These emissions will be verified through stack testing as outlined in Special Condition 1.

VOC emissions will increase on each machine due to an increased usage of additive associated with this project. All VOC emissions are considered fugitive in this process and therefore stack testing is not applicable. The emission factors used in the VOC emissions analysis were developed from the Material Safety Data Sheets (MSDS) submitted with the permit application and through the use of the mass balances around the process. Potential emissions of VOC are calculated based on the maximum chemical usage after the modification. Existing actual emissions are taken from P&G’s 2005 Emissions Inventory Questionnaire submittals. The following table provides an emissions summary for this project.

Table 4: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	**Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	Emission Increase: Actual – Potential
PM ₁₀	15.0	Major	63.16	15.42	7.61
SOx	40.0	N/D	0.87	N/A	N/A
NOx	40.0	Major	145.58	N/A	N/A
VOC	40.0	Major	132.03	76.7**	7.06
CO	100.0	Major	239.67	N/A	N/A
HAPs	10.0/25.0	N/D	6.36	N/A	N/A

N/A = Not Applicable; N/D = Not Determined

**All VOC emissions from this project are considered fugitive.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ and VOC from the project are above de minimis level. Emissions of PM₁₀ and VOC are below de minimis levels based on the actual-to-potential test per 40 CFR 52.21.

APPLICABLE REQUIREMENTS

The Procter & Gamble Paper Products Company shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Fuad Wadud
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated February 5, 2007, received February 9, 2007, designating The Procter & Gamble Company as the owner and operator of the installation.
- Material Safety Data Sheets (MSDS).
- Southeast Regional Office Site Survey, dated February 28, 2007.

Mr. Bill Barkley
Plant Manager
The Procter & Gamble Paper Products Company
P.O. Box 400
Cape Girardeau, MO 63702

RE: New Source Review Permit - Project Number: 2007-02-024

Dear Mr. Barkley:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Fuad Wadud at (573) 751-4817, or you may write to me at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH: fwl

Enclosures

c: Southeast Regional Office
PAMS File 2007-02-024
Permit Number: