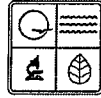


STATE OF MISSOURI

PERMIT BOOK



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: 032008-008 Project Number: 2007-09-019

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, MO 63755

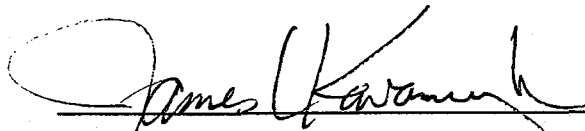
Location Information: Cape Girardeau County, S5, T32, R14

Application for Authority to Construct was made for:
Construction of 1 new diaper line. 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.

MAR 14 2008

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.

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Permit No.	
Project No.	2007-09-019

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
 - 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 Building 11 Central Dust Receiver (ECD69; EP43A) and the AZO-AGM Final Filter (EP44A). 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 new equipment, 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

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Project No.	2007-09-019

SPECIAL CONDITIONS:

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

from the required Environmental Protection Agency (EPA) Method for at least one (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 new equipment 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 Requirements – Baghouse
- A. The P&G shall control emissions from Building 11 Central Dust Receiver (ECD69; EP43A) and the diaper line CG57 (EP44A) using baghouses as specified in the permit application. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the DNR employees may easily observe them. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - B. The P&G shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - C. The P&G shall maintain an operating and maintenance log for the baghouses which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of

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Project No.	2007-09-019

SPECIAL CONDITIONS:

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

- 2) event, probable cause, and corrective actions; and
Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

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

Project Number: 2007-09-019
Installation ID Number: 031-0053
Permit Number:

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

Complete: September 13, 2007
Reviewed: December 26, 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 Products Company has applied for authority to construct 1 new diaper line.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- 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.
- Baghouses are being used to control the particulate 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 are below de minimis levels.
- 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] due to the combined boiler capacity which is greater than 250 MMBTU/hr for all fossil-fired boilers.

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is required for the equipment.
- A Part 70 Operating Permit amendment 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: Previously Issued 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.
052007-011	Modification of paper machines 5G, 6G, and 7G

PROJECT DESCRIPTION

The Procter & Gamble Paper Products Company has applied for authority to construct 1 new diaper line. The new line will be constructed in a building that currently houses existing lines. The new line will consist of an on line baghouse and absorbent material delivery system. The new dust receiver will accept dust transfer from existing dust control devices and provide baling capability of the dust for recycling.

Diaper production consists of an assembly process and a packaging process. During the assembly process, fiber and absorbent materials are added to a plastic backsheet. A fabric cover along with elastic and adhesive tapes are added before the diaper is folded. During packaging, the diapers are placed in plastic bags and then into boxes. The boxes are warehoused and shipped as needed.

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.

EMISSIONS/CONTROLS EVALUATION

The pollutant of concern from this project is PM₁₀. Potential emissions were determined using the maximum hourly design rate of the diaper line and the maximum weight of the raw material. A mass balance approach was used to determine an emission factor based on the processing operations. Baghouses are used to control particulate emissions from this project.

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Existing and actual potential emissions were taken from the installation’s Emission Inventory Questionnaire (EIQ). The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2006 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	Major	69.91	10.76	N/A
SO _x	40.0	N/D	1.20	N/A	N/A
NO _x	40.0	Major	153.56	N/A	N/A
VOC	40.0	Major	174.23	N/A	N/A
CO	100.0	Major	250.50	N/A	N/A
HAPs	10.0/25.0	N/D	6.00	N/A	N/A

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

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 are below de minimis levels.

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.

Emily Wilbur
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated September 6, 2007, received September 13, 2007, designating The Procter & Gamble Paper Products Company as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southeast Regional Office Site Survey, dated October 4, 2007.

Mr. Scott Smith
Environmental Manager
The Procter & Gamble Paper Products Company
P.O. Box 400
Cape Girardeau, MO 63702-0400

RE: New Source Review Permit - Project Number: 2007-09-019

Dear Mr. Smith:

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 me by telephone at (573) 751-4817, or you may write to the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Thank you,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:ewn

Enclosure

c: Southeast Regional Office
PAMS File 2007-09-019
Permit Number: