



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: **07 2016 - 010**

Project Number: 2016-04-032
Installation Number: 031-0053

Parent Company: The Procter & Gamble Company

Parent Company Address: 6090 Center Hill Avenue, Cincinnati, OH 45224

Installation Name: The Procter & Gamble Paper Products Company

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

Location Information: Cape Girardeau County, S4/5, T32N, R14E

Application for Authority to Construct was made for:
Conversion of Lines 56, 58 - 61, 66, and 67 to the M6 formulation and a line speed increase. This review was conducted in accordance with Section (5) of 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.

Alana Hess for
Prepared by
Alana Hess
New Source Review Unit

Kymberly Moore
Director or Designee
Department of Natural Resources

JUL 29 2016

Effective Date

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 Enforcement and Compliance Section of 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 Enforcement and Compliance Section of 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 within 30 days of actual startup. Also, you must notify the Department's Southeast Regional Office within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's 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 using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
<http://dnr.mo.gov/regions/>

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(12)(A)10. "Conditions required by permitting authority."

The Procter & Gamble Paper Products Company
Cape Girardeau County, S4/5, T32N, R14E

1. Superseding Condition

The conditions of this permit supersede all special conditions found in construction permit 122015-014 previously issued by the Air Pollution Control Program.

2. Control Device Requirement – Baghouses

A. The Procter & Gamble Paper Products Company shall control particulate emissions from the following emission sources using high efficiency baghouses as specified in the permit application:

- 1) 03A Lines 58 – 61 FSC
- 2) 08A Lines 66 – 67 CSX/FSC
- 3) 11A Lines 58 – 61 CSX
- 4) 15A D Mod CVC
- 5) 18A B Mod CVC
- 6) 36A Lines 66 – 67 AGM
- 7) 38A Lines 58 – 61 AGM
- 8) 43A Building 11 Central Dust Receiver
- 9) 46A Line 56 AGM

B. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. Each 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 Department of Natural Resources' employees may easily observe them.

C. Replacement filters for the baghouses shall be kept on hand at all times. The high efficiency filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

D. The Procter & Gamble Paper Products Company shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours of operation of the emission sources. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance specifications.

SPECIAL CONDITIONS:

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

- E. The Procter & Gamble Paper Products Company shall maintain a copy of the baghouse manufacturer's performance specifications on site.
 - F. The Procter & Gamble Paper Products Company 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 event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3. Control Device Requirement –Drum Filters
- A. The Procter & Gamble Paper Products Company shall control particulate emissions from the following emission sources using high efficiency drum filters as specified in the permit application:
 - 1) 02A Line 56 CSX/FSC
 - 2) 30A Line 66 FSC
 - 3) 31A Line 67 FSC
 - 4) 34A Lines 66 – 67 CSX
 - B. The drum filters shall be operated and maintained in accordance with the manufacturer's specifications. Each drum filter 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 Department of Natural Resources' employees may easily observe them.
 - C. Replacement filters shall be kept on hand at all times. The high efficiency filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - D. The Procter & Gamble Paper Products Company shall monitor and record the operating pressure drop across the drum filters at least once every 24 hours of operation of the emission sources. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance specifications.
 - E. The Procter & Gamble Paper Products Company shall maintain a copy of the drum filter manufacturer's performance specifications on site.
 - F. The Procter & Gamble Paper Products Company shall maintain an operating and maintenance log for the high efficiency drum filters which shall include the following:

SPECIAL CONDITIONS:

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

- 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.
4. **Operational Requirement - Solvent/Inks/Perfumes**
The Procter & Gamble Paper Products Company shall keep all solvents, inks, and perfumes in sealed containers whenever the materials are not in use. The Procter & Gamble Paper Products Company shall provide and maintain suitable, easily read, permanent markings on all solvents, inks, lotions, and perfumes used by Lines 56, 58 – 61, 66, and 67.
5. **Record Keeping and Reporting Requirements**
The Procter & Gamble Paper Products Company shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.
6. **Performance Testing**
- A. The Procter & Gamble Paper Products Company shall conduct performance testing to verify that emissions from the stated equipment is less than the following maximum particulate emission rate(s):
 - 1) AZO 3 for Line 58 – EP38A, ECD 58: 0.019 lb/hr
 - 2) Baghouse for Line 58 to 61 – EP11A, ECD 28: 0.040 lb/hr, and
 - 3) Baghouse for Line 58 – EP03A, ECD 18: 0.014 lb/hr.
 - B. Performance testing shall be conducted on the outlet of ECD 28, ECD 18, or ECD 58 using an EPA test method approved by the Air Pollution Control Program to obtain the controlled PM emission rate (lb/hr).
 - C. The throughput of the FSC, CSX and AGM in all lines being tested shall be recorded during the performance testing required by Special Condition 6.A.
 - D. These tests shall be performed within 60 days after achieving the maximum production rate of the installation, but not later than 180 days after initial start-up for commercial operation.
 - E. A completed Proposed Test Plan Form (enclosed) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required

SPECIAL CONDITIONS:

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

emission testing.

- F. One electronic report of the performance test results shall be submitted to the Director within 90 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
- G. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations.
- H. If performance test results indicate any of the following The Procter & Gamble Paper Products Company shall also submit revised emissions calculations for Projects 2015-05-085, 2016-01-041, and 2016-04-032 to the Air Pollution Control Program's Permit Section:
 - 1) The stack test results indicate any of the maximum particulate emission rates are greater than those specified for verification in Special Condition 6.A

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

Project Number: 2016-04-032
Installation ID Number: 031-0053
Permit Number:

Installation Address:

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

Parent Company:

The Procter & Gamble Company
6090 Center Hill Avenue
Cincinnati, OH 45224

Cape Girardeau County, S4/5, T32N, R14E

REVIEW SUMMARY

- The Procter & Gamble Paper Products Company has applied for authority to increase the line speed of Lines 56, 58 – 61, 66, and 67 and to convert the lines to the M6 formulation.
- The application was deemed complete on June 28, 2016.
- HAP emissions are not expected from the proposed equipment. The SDS for the solvents, inks, lotions, and perfumes used in the M6 formulation indicate that the materials do not contain any HAPs.
- None of the regulations currently promulgated at 40 CFR Parts 60, 61, and 63 apply to the proposed equipment.
- High efficiency baghouses and high-efficiency drum filters are being used to control particulate emissions from the proposed equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*. Potential controlled emissions of all pollutants are below de minimis levels; however, a permit was required to institute practically enforceable control device requirements.
- This installation is located in Cape Girardeau County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- 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 to verify the FSC, CSX, and AGM maximum particulate emission rates.
- The Procter & Gamble Paper Products Company shall submit any revisions necessary to incorporate the increased material throughput of these emission sources into their Part 70 operating permit renewal application, Project 2015-10-032, no later than 90 days after the issuance of this permit.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

The Procter & Gamble Paper Products Company operates a sanitary disposable paper products manufacturing facility in Jackson, Missouri. This installation is an existing major source for both construction permits and operating permits. The installation currently operates under Part 70 operating permit OP2011-013 which expired April 20, 2016. A Part 70 operating permit renewal application, Project 2015-10-032, was received by the Air Pollution Control Program on October 16, 2015 and is under review. Until the issuance of the Part 70 renewal application, the installation continues to operate under OP2011-013.

The following construction permits have been issued to The Procter & Gamble Paper Products Company by the Air Pollution Control Program:

Table 1: Permit History

| 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 new air handling units, an emergency generator, and four natural gas-fired space heaters |
| 112004-010 | Addition of four new diaper lines and one absorbent delivery system |
| 052006-004 | Construction of three new diaper lines |
| 052007-011 | Modification of paper machines 5G, 6G, and 7G |
| 032003-041B | Removal of RATA and PEMS for CO for boilers 3, 4, and 5 |
| 032008-008 | Construction of one new diaper line |
| 072008-012 | Modification of eight diaper lines |
| 052007-011A | Scrubber special conditions |
| 032003-041C | Alternate operating scenarios |

| | |
|------------|--|
| 092012-006 | Installation of Operations 8 and 9 |
| 092015-002 | Installation of Lines 51 and 57 |
| 122015-014 | Installation of Line 56 |
| 032016-008 | AGM boost on Lines 52 – 54, 58 – 59, 62 – 65, and 68 |

PROJECT DESCRIPTION

The Procter & Gamble Paper Products Company has applied for authority to increase the line speed of Lines 56, 58 – 61, 66, and 67 and to convert the lines to the M6 formulation. The Procter & Gamble Paper Products Company has requested that the following project information remain confidential (see confidential file 2016-10-043):

- Diaper pad formula including total pad weight and the weight of pad constituents;
- Process flow diagrams;
- Line throughput information;
- Control device efficiency information;
- Unit-specific maximum hourly design rates and emission factors; and
- Ink and solvent formulas and SDS.

The increased line speed and formulation change affects multiple existing emission sources. Affected emission sources are indicated in Table 2.

Table 2: Project Equipment List

| Emission Source | Description | Project Status | Control Equipment |
|-----------------|--|----------------|--|
| 02A | AGM, FSC, and CSX (Lines 52, 54, and 55) | Unaffected | ECD 30 Focke & Co High Efficiency Baghouse |
| | AGM, FSC, and CSX (Line 53) | Unaffected | ECD 37 JOA High Efficiency Baghouse |
| | CSX and FSC (Line 56) | Modified | ECD 75 High Efficiency Drum Filter |
| 03A | CSX and FSC (Line 57) | Unaffected | ECD 71 High Efficiency Drum Filter |
| | FSC (Line 58) | Modified | ECD 18 Focke & Co High Efficiency Baghouse |
| | FSC (Line 59) | Modified | ECD 20 Focke & Co High Efficiency Baghouse |
| | FSC (Line 60) | Modified | ECD 25 Focke & Co High Efficiency Baghouse |
| | FSC (Line 61) | Modified | ECD 26 Focke & Co High Efficiency Baghouse |
| 08A | CSX (Lines 66 – 67) | Modified | ECD 47 High Efficiency Drum Filter and ECD 36 DCE Vokes High Efficiency Baghouse |
| | CSX (Lines 68 – 69) | Unaffected | |
| | FSC (Line 66) | Modified | ECD 43 High Efficiency Drum Filter and ECD 36 DCE Vokes High Efficiency Baghouse |
| | FSC (Line 67) | Modified | ECD 44 High Efficiency Drum Filter and ECD 36 DCE Vokes High Efficiency |

| | | | |
|-----------|--|------------|--|
| | | | Baghouse |
| | FSC (Line 68) | Unaffected | ECD 45 High Efficiency Drum Filter and ECD 36 DCE Vokes High Efficiency Baghouse |
| | FSC (Line 69) | Unaffected | ECD 46 High Efficiency Drum Filter and ECD 36 DCE Vokes High Efficiency Baghouse |
| 11A | CSX (Lines 58 – 61) | Modified | ECD 28 JOA High Efficiency Baghouse |
| 15A | D Mod CVC (Lines 62 – 65, 68, and 69) | Unaffected | ECD 06 Flexkleen High Efficiency Baghouse |
| | D Mod CVC (Lines 66 and 67) | Modified | |
| 18A | A Mod CVC (Lines 51 - 55) | Unaffected | ECD 03 Flexkleen High Efficiency Baghouse |
| | B Mod CVC (Line 57) | Unaffected | ECD 15 Flexkleen High Efficiency Baghouse |
| | B Mod CVC (Lines 56 and 58 - 61) | Modified | |
| 30A | FSC (Line 66) | Modified | ECD 43 High Efficiency Drum Filter |
| 31A | FSC (Line 67) | Modified | ECD 44 High Efficiency Drum Filter |
| 34A | CSX (Lines 66 and 67) | Modified | ECD 47 High Efficiency Drum Filter |
| | CSX (Lines 68 and 69) | Unaffected | |
| 36A | AGM (Line 52) | Unaffected | ECD 63 Azo High Efficiency Baghouse |
| | AGM (Line 66) | Modified | ECD 52 Azo High Efficiency Baghouse |
| | AGM (Line 67) | Modified | ECD 53 Azo High Efficiency Baghouse |
| | AGM (Line 68) | Unaffected | ECD 54 Azo High Efficiency Baghouse |
| | AGM (Line 69) | Unaffected | ECD 55 Azo High Efficiency Baghouse |
| 38A | AGM (Line 58) | Modified | ECD 58 Azo High Efficiency Baghouse |
| | AGM (Line 59) | Modified | ECD 59 Azo High Efficiency Baghouse |
| | AGM (Line 60) | Modified | ECD 60 Azo High Efficiency Baghouse |
| | AGM (Line 61) | Modified | ECD 61 Azo High Efficiency Baghouse |
| 43A | Building 11 Central Dust Receiver (Lines 56, 58 – 61, 66, and 67) | Modified | ECD 69 MAC High efficiency baghouse |
| | Building 11 Central Dust Receiver (Lines 51 – 55, 57, 62 – 65, 68, and 69) | Unaffected | |
| 46A | AGM (Line 56) | Modified | ECD 74 Azo High Efficiency Baghouse |
| Packaging | Packaging Solvent and Ink (Lines 56, 58 – 61, 66, and 67) | Modified | None |
| | Packaging Solvent and Ink (Lines 51 – 55, 57, 62 – 65, 68, and 69) | Unaffected | |
| Fugitive | Paved Haul Road | Modified | None |

This project is considered one project with Project 2015-10-040 (Permit 122015-014) which was issued on December 23, 2015 for the installation of Line 56; therefore, the

conditions of Permit 122015-014 have been superseded and Line 56 has been evaluated at PTE towards project emissions totals.

The emissions increases from the line speed increases and switch to the M6 formulation on the existing lines (Lines 58 – 61, 66, and 67) were evaluated on an actual-to-potential basis. Where the actual emissions from Lines 58 – 61, 66, and 67 were determined to be the average rate (tpy) at which the lines actually emitted during the 24-month period of calendar years 2013 and 2014. The emissions increases are available in Tables 3 - 6.

Table 3: PM Emissions Increase Analysis (tons per year)

| Emission Source | Description | PTE | BAE 1/2013 – 12/2014 | Emissions Increase |
|-----------------|--|--------------|-------------------------|--------------------|
| 02A | CSX and FSC (Line 56) | 0.10 | 0.00 | 0.10 |
| 03A | FSC (Lines 58 – 61) | 0.24 | 0.16 | 0.08 |
| 08A | CSX and FSC (Lines 66 – 67) | 0.21 | 0.11 | 0.10 |
| 11A | CSX (Lines 58 – 61) | 0.17 | 0.06 | 0.11 |
| 15A | D Mod CVC (Lines 66 and 67) | 0.004 | 0.002 | 0.002 |
| 18A | B Mod CVC (Lines 56 and 58 – 61) | 0.01 | 0.004 | 0.01 |
| 30A | FSC (Line 66) | 0.06 | 0.03 | 0.03 |
| 31A | FSC (Line 67) | 0.06 | 0.04 | 0.02 |
| 34A | CSX (Lines 66 and 67) | 0.09 | 0.03 | 0.06 |
| 36A | AGM (Lines 66 and 67) | 0.17 | 0.07 | 0.10 |
| 38A | AGM (Lines 58 – 61) | 0.33 | 0.16 | 0.18 |
| 43A | Building 11 Central Dust Receiver (Lines 51 - 69) | 0.29 | 0.19 | 0.10 |
| 46A | AGM (Line 56) | 0.08 | 0.00 | 0.08 |
| Fugitive | Paved Haul Road | 9.67 | 6.42 | 3.25 |
| Project | | 11.48 | 7.27 | 4.21 |

Table 4: PM₁₀ Emissions Increase Analysis (tons per year)

| Emission Source | Description | PTE | BAE 1/2013 – 12/2014 | Emissions Increase |
|-----------------|--|-------------|-------------------------|--------------------|
| 02A | CSX and FSC (Line 56) | 0.10 | 0.00 | 0.10 |
| 03A | FSC (Lines 58 – 61) | 0.24 | 0.16 | 0.08 |
| 08A | CSX and FSC (Lines 66 – 67) | 0.21 | 0.11 | 0.10 |
| 11A | CSX (Lines 58 – 61) | 0.17 | 0.06 | 0.11 |
| 15A | D Mod CVC (Lines 66 and 67) | 0.004 | 0.002 | 0.002 |
| 18A | B Mod CVC (Lines 56 and 58 – 61) | 0.01 | 0.004 | 0.01 |
| 30A | FSC (Line 66) | 0.06 | 0.03 | 0.03 |
| 31A | FSC (Line 67) | 0.06 | 0.04 | 0.02 |
| 34A | CSX (Lines 66 and 67) | 0.09 | 0.03 | 0.06 |
| 36A | AGM (Lines 66 and 67) | 0.17 | 0.07 | 0.10 |
| 38A | AGM (Lines 58 – 61) | 0.33 | 0.16 | 0.18 |
| 43A | Building 11 Central Dust Receiver (Lines 51 - 69) | 0.11 | 0.08 | 0.04 |
| 46A | AGM (Line 56) | 0.08 | 0.00 | 0.08 |
| Fugitive | Paved Haul Road | 1.93 | 1.28 | 0.65 |
| Project | | 3.57 | 2.02 | 1.55 |

Table 5: PM_{2.5} Emissions Increase Analysis (tons per year)

| Emission Source | Description | PTE | BAE 1/2013 – 12/2014 | Emissions Increase |
|-----------------|--|-------------|-------------------------|--------------------|
| 02A | CSX and FSC (Line 56) | 0.10 | 0.00 | 0.10 |
| 03A | FSC (Lines 58 – 61) | 0.24 | 0.16 | 0.08 |
| 08A | CSX and FSC (Lines 66 – 67) | 0.21 | 0.11 | 0.10 |
| 11A | CSX (Lines 58 – 61) | 0.17 | 0.06 | 0.11 |
| 15A | D Mod CVC (Lines 66 and 67) | 0.004 | 0.002 | 0.002 |
| 18A | B Mod CVC (Lines 56 and 58 – 61) | 0.01 | 0.004 | 0.01 |
| 30A | FSC (Line 66) | 0.06 | 0.03 | 0.03 |
| 31A | FSC (Line 67) | 0.06 | 0.04 | 0.02 |
| 34A | CSX (Lines 66 and 67) | 0.09 | 0.03 | 0.06 |
| 36A | AGM (Lines 66 and 67) | 0.17 | 0.07 | 0.10 |
| 38A | AGM (Lines 58 – 61) | 0.33 | 0.16 | 0.18 |
| 43A | Building 11 Central Dust Receiver (Lines 51 - 69) | 0.11 | 0.08 | 0.04 |
| 46A | AGM (Line 56) | 0.08 | 0.00 | 0.08 |
| Fugitive | Paved Haul Road | 0.47 | 0.32 | 0.16 |
| Project | | 2.11 | 1.06 | 1.06 |

Table 6: VOC Emissions Increase Analysis (tons per year)

| Emission Source | Description | PTE | BAE 1/2013 – 12/2014 | Emissions Increase |
|-----------------|--|--------------|-------------------------|--------------------|
| 02A | FSC (Line 56) | 2.67 | 0.00 | 2.67 |
| 03A | FSC (Lines 58 – 61) | 10.70 | 4.88 | 5.81 |
| 30A | FSC (Line 66) | 2.67 | 1.42 | 1.26 |
| 31A | FSC (Line 67) | 2.67 | 1.22 | 1.45 |
| Packaging | Packaging Solvent and Ink (Lines 51 - 69) | 3.12 | 2.17 | 0.95 |
| Project | | 21.84 | 9.68 | 12.15 |

Although the timing of this project [the increased material throughput for Lines 52 – 54, 58 – 59, 62 – 65, and 68 (Project 2016-01-041, Permit 032016-008)] and the installation of Lines 51 and 57 (Project 2015-05-085, Permit 092015-002) may raise a question as to whether the projects are separate, the Missouri Air Pollution Control has not made a formal decision as to whether these projects should or should not be aggregated. It should be noted that if the projects were to be aggregated, emissions calculations indicate that the aggregate emissions increases are below the PSD significance levels for PM, PM₁₀, PM_{2.5}, and VOC. If additional modifications to the diaper lines at The Procter & Gamble Paper Products Company occur in the short-term, a formal decision may be required in order to assess PSD applicability.

EMISSIONS/CONTROLS EVALUATION

Uncontrolled particulate emission factors previously used by the other diaper lines at the installation were submitted as part of the application's emissions calculations for 02A, 03A, 08A, 11A, 15A, 18A, 30A, 31A, 34A, 36A, 38A, 43A, and 46A. Several of the maximum particulate emission rates will be verified by the performance testing required by Special Condition 6.

Emissions from the 1.0 mile paved haul road were calculated using Equation 2 from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 13.2.1 “Paved Haul Roads” (January 2011), a silt loading of 2 g/m², a mean vehicle weight of 20 tons, and 105 days per year with at least 0.01” of precipitation.

VOC emissions from the solvents, inks, lotions, and perfumes used to produce and package the diapers were determined using a mass balance approach and assuming 100% emission of the VOC contained within each material.

The following table provides an emissions summary for this project. Installation existing potential emissions were taken from Construction Permit 092015-002 as the addition of Line 56 (Construction Permit 122015-014) is considered one project with this project. The potential emissions of the application represent the emissions increase associated with this project. The installation’s current potential emissions reflect the sum of the existing installation’s potential emissions, the emissions increase associated with Permit 032016-008 (Project 2016-01-041), and the emissions increase associated with this permit. Existing actual emissions were taken from the installation’s 2015 EIQ.

Table 7: Emissions Summary (tons per year)

| Pollutant | Regulatory De Minimis Levels | Installation Existing Potential Emissions | Existing Actual Emissions (2015 EIQ) | Potential Emissions of the Application | Installation Current Potential Emissions |
|-------------------|------------------------------|---|--------------------------------------|--|--|
| PM | 25.0 | Major | N/A | 4.21 | Major |
| PM ₁₀ | 15.0 | 467.40 | 48.34 | 1.55 | 470.50 |
| PM _{2.5} | 10.0 | 86.54 | 14.83 | 1.06 | 88.72 |
| SO _x | 40.0 | 92.92 | 0.73 | N/A | 92.92 |
| NO _x | 40.0 | 446.88 | 76.85 | N/A | 446.88 |
| VOC | 40.0 | 767.16 | 200.76 | 12.15 | 792.76 |
| CO | 100.0 | 819.00 | 174.41 | N/A | 819.00 |
| HAPs | 10.0/25.0 | <10.0/25.0 | 4.53 | N/A | <10.0/25.0 |

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 controlled emissions of all pollutants are below de minimis levels; however, a permit was required to institute practically enforceable control device requirements.

APPLICABLE REQUIREMENTS

The Procter & Gamble Paper Products Company shall comply with the following applicable requirements that apply to the equipment modified by this permit. 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

- 10 CSR 10-6.065 *Operating Permits*
- 10 CSR 10-6.110 *Submission of Emission Data, Emission Fees and Process Information*
- 10 CSR 10-6.165 *Restriction of Emission of Odors*
- 10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*
- 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*

SPECIFIC REQUIREMENTS

- 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* will not apply to the modified emission sources, per 10 CSR 10-6.400(1)(B)15, as each emission source is required to operate a particulate matter control device that controls at least 90% of the particulate matter emissions.

STAFF RECOMMENDATION

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

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated April 11, 2016, received April 15, 2016, revised June 28, 2016 designating The Procter & Gamble Company as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

| | | | |
|-------------------------------|--|-------------------------------|--|
| % | percent | m/s | meters per second |
| °F | degrees Fahrenheit | Mgal | 1,000 gallons |
| acfm | actual cubic feet per minute | MW | megawatt |
| BACT | Best Available Control Technology | MHDR | maximum hourly design rate |
| BMPs | Best Management Practices | MMBtu | Million British thermal units |
| Btu | British thermal unit | MMCF | million cubic feet |
| CAM | Compliance Assurance Monitoring | MSDS | Material Safety Data Sheet |
| CAS | Chemical Abstracts Service | NAAQS ... | National Ambient Air Quality Standards |
| CEMS | Continuous Emission Monitor System | NESHAPs | National Emissions Standards for Hazardous Air Pollutants |
| CFR | Code of Federal Regulations | NO_x | nitrogen oxides |
| CO | carbon monoxide | NSPS | New Source Performance Standards |
| CO₂ | carbon dioxide | NSR | New Source Review |
| CO_{2e} | carbon dioxide equivalent | PM | particulate matter |
| COMS | Continuous Opacity Monitoring System | PM_{2.5} | particulate matter less than 2.5 microns in aerodynamic diameter |
| CSR | Code of State Regulations | PM₁₀ | particulate matter less than 10 microns in aerodynamic diameter |
| dscf | dry standard cubic feet | ppm | parts per million |
| EQ | Emission Inventory Questionnaire | PSD | Prevention of Significant Deterioration |
| EP | Emission Point | PTE | potential to emit |
| EPA | Environmental Protection Agency | RACT | Reasonable Available Control Technology |
| EU | Emission Unit | RAL | Risk Assessment Level |
| fps | feet per second | SCC | Source Classification Code |
| ft | feet | scfm | standard cubic feet per minute |
| GACT | Generally Available Control Technology | SDS | Safety Data Sheet |
| GHG | Greenhouse Gas | SIC | Standard Industrial Classification |
| gpm | gallons per minute | SIP | State Implementation Plan |
| gr | grains | SMAL | Screening Model Action Levels |
| GWP | Global Warming Potential | SO_x | sulfur oxides |
| HAP | Hazardous Air Pollutant | SO₂ | sulfur dioxide |
| hr | hour | tph | tons per hour |
| hp | horsepower | tpy | tons per year |
| lb | pound | VMT | vehicle miles traveled |
| lbs/hr | pounds per hour | VOC | Volatile Organic Compound |
| MACT | Maximum Achievable Control Technology | | |
| µg/m³ | micrograms per cubic meter | | |

Mr. Arthur Meng
Plant Manager
The Procter & Gamble Paper Products Company
14484 State Highway 177
Jackson, MO 63755

RE: New Source Review Permit - Project Number: 2016-04-032

Dear Mr. Bryant:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions 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 revision of the operating permit renewal application 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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to §§621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission 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 administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.

Mr. Arthur Meng
Page Two

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:ahj

Enclosures

c: Southeast Regional Office
PAMS File: 2016-04-032

Permit Number: