



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: 082014-018 Project Number: 2014-04-017 Installation Number: 031-0072

Parent Company: Mondi Jackson, Inc.

Parent Company Address: 14591 State Highway 177, Jackson, MO 63755

Installation Name: Mondi Jackson, Inc.

Installation Address: 14591 State Highway 177, Jackson, MO 63755

Location Information: Cape Girardeau County, S5, T32N, R14E

Application for Authority to Construct was made for:

The installation of a new flexographic printing press. 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.

JUL 26 2014

EFFECTIVE DATE

Signature of Director or Designee: Kymberly Rose
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 these air contaminant sources. The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of these air contaminant sources.

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 sources(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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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."

Mondi Jackson, Inc.
Cape Girardeau County, S5, T32N, R14E

1. **Superseding Condition**
The conditions of this permit supersede all of the special conditions found in the previously issued construction permit no. 042012-006 and Special Condition No. 2 in previously issued construction permit no. 052008-002 issued by the Air Pollution Control Program.
2. **Control Device Requirements – Regenerative Thermal Oxidizer**
 - A. Mondi Jackson, Inc. shall control emissions from the flexographic printing press (ATM-40) using one of two regenerative thermal oxidizers (RTO), Adwest 25 (CD-5) or Adwest 55 (CD-6), as specified in the permit application.
 - B. The RTOs shall be in use at all times the flexographic printing press (ATM-40) is in operation. The RTO shall be operated and maintained in accordance with the manufacturer's specifications. A copy of the manufacturer's specifications shall be kept on-site.
 - C. The operating temperature of the RTO shall be continuously monitored and recorded during operations. The operating temperature of the RTO shall be maintained at no less than 1,500 °F.
 - D. Mondi Jackson, Inc. shall maintain an operating and maintenance log for the RTOs 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. **Capture Device Requirements – Total Enclosure**
 - A. Mondi Jackson, Inc. shall verify that the building is a total enclosure by performing the following tests on the door openings of the building.

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SPECIAL CONDITIONS:

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

- 1) Verify that a negative pressure exists at the door using a micromanometer. The negative pressure must be greater than 0.007 inches H₂O.
 - 2) Verify, through the use of a visual indicator such as smoke tube, powder, streamers, etc., that the air flow is into the building.
 - B. Tests required in Special Condition 3.A. shall be performed once every month for the first twelve months after the new flexographic printing press becomes operational. If any of the tests show that the installation is not in compliance with Special Conditions 3.A.1) and 3.A.2), Mondi Jackson, Inc. shall apply corrective actions to bring the enclosure back into compliance within 15 days of the noncompliant test. If corrective action fails to bring the enclosure back into compliance, Mondi Jackson, Inc. shall contact the Air Pollution Control Program for further instructions.
 - C. All doors for the building shall remain closed during operations except during personnel and equipment entry and exit (i.e. there should be no propping open of the doors, etc.). All access panels on the new printing press (ATM-40) shall also remain closed any time the printing press is in operation.
4. **Operational Requirement – Ink and Solvents**
Mondi Jackson, Inc. shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. Mondi Jackson, Inc. shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.
 5. **Emission Limits – VOCs**
 - A. Mondi Jackson, inc. shall emit less than 245.0 tons of VOCs from Mondi Jackson – Indian Creek in any consecutive 12-month period. For the purpose of this special condition, Mondi Jackson – Indian Creek shall include all source operations including activities that results in fugitive emissions located at 14591 State Highway 177, Jackson, MO 63755. Mondi Jackson – Indian Creek includes the emission points and/or units listed below.

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SPECIAL CONDITIONS:

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

Table 1: Emission Points and/or Emission Units at Mondi Jackson – Indian Creek

Emission Point/Units	Description
ATM-1	10,000 gallon storage tank (N-propyl acetate)
ATM-2	10,000 gallon storage tank (solvent blend)
ATM-4	Roto Presses 2201, 2202, 2203. Windmoller Hoscher rotogravure printing presses. Presses 2201 and 2202 are 7-deck presses. Press 2203 is an 8-deck press. Emissions routed to thermal oxidizers.
ATM-5	Ink mixing and storage, 275 gallon tote containers
ATM-7	Boiler, 9,96 MMBtu/hr propane
ATM-9	PRI distillation units (2). Emissions included with ATM-27.
ATM-13	PRI dirty solvent tanks. One 500 gallon tank and one 1,000 gallon tank. Emissions included with ATM-27.
ATM-15	PRI clean solvent tanks. Two 500 gallon tanks and one 1,000 gallon tank. Emissions included with ATM-27.
ATM-17	Cylinder preparation – degreasing, toluene and methanol
ATM-18	Cylinder preparation – nickel plating
ATM-19	Cylinder preparation – copper plating
ATM-20	Cylinder preparation – chrome plating
ATM-21	Cylinder preparation – de-chrome
ATM-22	Emergency diesel water pumps (2)
ATM-23	Corona treater ozone exhaust
ATM-24	Polyethylene pellet silos (16)
ATM-25	Blown film extrusion lines (6)
ATM-27	PRI parts washing system (incorporating ATM-9, ATM-13, and ATM-15)
ATM-28	Roto Press 2204. Windmoller Holscher 1.7 meter rotogravure printing press. Emissions routed to thermal oxidizers.
ATM-29	Laminator 2253. 1.7 meter width

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SPECIAL CONDITIONS:

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

ATM-31	Roto press 2205. Shaanxi Bieren 2 meter rotogravure printing press. Emissions routed to thermal oxidizers.
ATM-32	10,000 gallons storage tank (ethyl acetate)
ATM-33	10,000 gallon storage tank (ink and solvent)
ATM-34	Boiler, 3.3 MMBtu/hr propane
ATM-35	Misc propane usage emissions
ATM-40	New flexographic printing press
CD-5	Atwest 25 RTO
CD-6	Atwest 55 RTO

- B. Within 60 days after permit issuance, Mondi Jackson, Inc. shall submit a form to be used in tracking VOC emissions to the New Source Review Unit of the Air Pollution Control Program for approval. The form must include, at a minimum, the following.
- 1) List of equipment that emits VOC,
 - 2) Calculation methods to be used in calculating VOC emissions from each equipment that emits VOC, and
 - 3) Capture and control device efficiencies used for the control devices.
6. Record Keeping and Reporting Requirements
- A. Mondi Jackson, Inc. 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 MSDS for all materials used.
- B. Mondi Jackson, Inc. shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

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

Project Number: 2014-04-017
Installation ID Number: 031-0072
Permit Number:

Mondi Jackson, Inc.
14591 State Highway 177
Jackson, MO 63755

Complete: April 7, 2014

Parent Company:
Mondi Jackson, Inc.
14591 State Highway 177
Jackson, MO 63755

Cape Girardeau County, S5, T32N, R14E

REVIEW SUMMARY

- Mondi Jackson, Inc. has applied for authority to install a new flexographic printing press (ATM-40).
- HAP emissions are expected from the propane dryer but will be in amounts less than the Screening Model Action Levels (SMAL). The RTOs are existing equipment also used to control emissions from other equipment at the installation and its emissions are not considered part of this project.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- RTOs are being used to control the 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 all pollutants are below de minimis levels.
- 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 not required for the equipment.
- A modification the facility's Part 70 Operating Permit application is required for this installation within one year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Mondi Jackson, Inc. currently owns and operates a rotogravure printing operation and polyethylene bag manufacturing facility at 14591 State Highway 177 in Jackson, MO (ID No. 031-0072). This facility manufacturing items such as polyethylene films, bags, and flexible packaging. It previously operated under the name of Nordenia U.S.A., Inc. and was known as Nordenia #1. It will now be referred to as Mondi Jackson – Indian Creek. Mondi Jackson, Inc. also owns and operates a polyethylene bag manufacturing facility at 3151 N. High Street in Jackson, MO. This operation formerly also operated under the name of Nordenia U.S.A., Inc. and was known as Nordenia #2. It will now be referred to as Mondi Jackson – Hubble Creek. The two installations are considered the same installation for permitting purposes.

The installation is a Part 70 source for operating permits. It is believed that this installation is a minor source for construction permits. Mondi Jackson – Indian Creek has taken a 245 tpy VOC limit for the facility. Mondi Jackson – Hubble Creek's VOC potential to emit is less than 5 tpy. Therefore, the PTE of the installation is less than 250 tpy and the installation remains a minor facility with regards to New Source Review Permitting.

Although the particulate (PM_{2.5}, PM₁₀, and PM), SO_x, NO_x, CO and HAP emissions have not been calculated for the entire installation, the installation does not operate equipment (i.e. solvent storage tanks, printing presses, parts washers, laminators, etc.) that should emit amounts above their major source levels. These equipment emits mainly VOCs. However, Mondi Jackson, Inc. should still, in its next Part 70 Operating Permit application, submit installation-wide PTE calculations for these pollutants to confirm that the PTE are less than their major source levels.

The following New Source Review permits have been issued to Mondi Jackson, Inc. from the Air Pollution Control Program.

Table 2: Permit History

For Mondi Jackson – Indian Creek	
Permit Number	Description
0690-015	Polyethylene sheeting extrusion process
1289-003	Polyethylene laminate and printing process
1293-014	Solvent washing machine
0794-013	Rotogravure printing press and wicket bag machine
0795-010	Waste solvent reclamation unit
102000-026	Rotogravure printing press
042006-005	Laminator
042006-005A	Laminator colors amendment
052008-002	Rotogravure printing press
042012-006	Increasing production

For Mondi Jackson – Hubble Creek	
Permit Number	Description
042012-005	Moving equipment from Mondi-Jackson – Indian Creek to a new location

PROJECT DESCRIPTION

Mondi-Jackson, Inc. plans to install a new flexographic printing press (ATM-40) at Mondi Jackson – Indian Creek. The new unit will be a 59 inch MIRAFLEX®CL 10 infinitely variable repeat length fast changeover central impression flexographic printing press. The proposed new press will print labels onto polyethylene (PE), polyethylene terephthalate (PET), and polypropylene (OPP) materials using solvent based inks. It can print a maximum of 500 meters (1,640 feet) per minute. With a printing width of 57 inches, the press will be capable of printing a maximum of 43,434 square meters per hour (m²/hr), or 467,519.7 square feet per hour (ft²/hr). The maximum ink usage is expected to be 0.006615 pounds per square meter (lb/m²), or 0.000618 pounds per square feet (lb/ft²). The press will use a propane gas-fired dryer rated at 0.625 MMBtu/hr.

Mondi Jackson must construct an addition to the existing facility in order to house the new printing press. Emissions from the equipment will be routed to a common header that will send the emissions to existing regenerative thermal oxidizers (RTOs) Adwest 25 (CD-05) or Adwest 55 (CD-06). According to the company, the installation of the press will not debottleneck any existing equipment at the site.

EMISSIONS/CONTROLS EVALUATION

The printing press is expected to emit VOCs while the propane-fired dryer will emit combustion products including particulates, NO_x, SO_x, CO, VOC, GHG, and HAPs. VOC emissions from the use of the inks were calculated using mass balances. According to the application, most of the inks contain 50 to 75 percent VOC by weight. However, the MSDS for a sample ink shows that the VOC content of the ink is listed as greater than 75%. To be conservative, the calculations used for this project assumes that 100% of the ink are emitted. Although unrealistic, this assumption does give an estimate of the worst emission possible from the ink usage. Furthermore, because the facility is using RTOs to control the VOC emissions from the equipment, assuming 100% did not change the type of permit that should be issued. The VOC emissions from the project are still under the *de minimis* level of 40 tons per year.

The RTOs were given a control device efficiency of 99.15%. This is taken from stack tests performed by the installation in 2009 and approved by the Enforcement Unit of the Air Pollution Control Program. Both Atwest 25 (CD-05) and Adwest 55 (CD-06) were tested and the lowest of the control efficiencies were used for the calculations. The devices were given a capture efficiency of 99.18%. This number was obtained from a test performed in 2006 and approved by the Enforcement Unit of the Air Pollution Control Program. This test was performed on the building enclosure. However, because Mondi Jackson, Inc. plans to construct an addition to the building, it is not known how the new construction would affect the capture efficiency.

In subsequent communications with the company, the company asserted that the capture efficiency should not decrease due to the following reasons.

1. The new construction will not add any new openings.
2. The building has three (3) emergency doors and one (1) equipment access door which will not be used on a daily basis. The equipment door will be used only when receiving new equipment.
3. The personnel doors are built with vestibules using 2 doors which will minimize any air exchange from inside to outside.
4. The building expansion is connected directly to the existing print hall with framed openings allowing full exchange of air throughout the facility.
5. The building is specified to be sealed and the HVAC systems are designed to maintain the negative building pressures.

Furthermore, the new press has an enclosure around the printing section and exhaust/drying ducting between all the decks. There are access doors on the press that can be opened while running, but during normal operations, the access door will remain closed. Due to these reasons, the 99.18% was accepted for use. However, there are now special conditions in this permit that requires the facility to keep all doors closed during operations except during personnel/equipment entry and exit, to keep the access door on the new printing press closed during operations, and to test to show that the building is considered a total enclosure in accordance with EPA method 204.

Method 204 has requirements for the following: 1) equivalent diameters of the natural draft opening (NDO) to VOC emitting point, 2) equivalent diameters of the NDO to exhaust, 3) NDO to enclosure area ratio, 4) NDO facial velocity determinations, and 5) NDO air flow direction. For requirements 1), 2), and 3), since the building does not have any NDO, the criteria could not be applied. For requirement 4), the method allows the use of pressure drop to substitute for facial velocity determinations. As long as the negative pressure drop across the opening is greater than 0.007 inches H₂O, then the criteria is met. Although the building does not have NDO, the door can be opened slightly for a short moment in order to measure the pressure drop with a micromanometer. For requirement 5), the door can also be opened to verify the flow direction with a visual indicator such as dust tubes, talc puff test, streamers, and etc. Therefore, requirements 4) and 5) are included in this permit as a Special Condition (No. 3) to ensure that the building can still be considered a permanent total enclosure as determined by Method 204. Requirements 1), 2), and 3) are deemed not applicable and not included in this permit. This procedure is the same as those used during the capture efficiency test in 2006 to ensure that the building is a total enclosure.

The new printing press has a built-in cleaning system that uses a solution of 80% n-propyl alcohol and 20% n-propyl acetate cleaning solvent. Mondi Jackson plans to clean eight (8) printing decks a maximum of 12 times each day on 350 days per year. The emissions calculation assumes 365 days per year. Each cleaning event uses 2.11 gallons of solvent per printing deck. According to the company, 99.5% of the solvent is recycled or wasted and the remaining 0.5% will be emitted as VOCs. These numbers cannot be verified with the information given in the application. Therefore, it was assumed conservatively that all 100% of the solvent are emitted as VOC. With the RTO

being used to control VOC emissions, assuming 100% solvent emitted will not change the type of permit being issued for this project. The 245.0 tpy limit for Mondi Jackson – Indian Creek is restated in this permit and includes emissions from the new printing press. When the facility tracks the VOC emissions for the 245.0 tons per year VOC limit, it must keep documentation showing that 99.5% of the solvent is recycled or wasted if it wants to use the 0.5% emission rate.

Emissions from combustion of propane were calculated using EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Chapter 1.5, *Liquefied Petroleum Gas Combustion*, (July, 2008).

The following table provides an emissions summary for this project. Existing actual emissions were taken from the installation’s 2013 EIQ. Potential emissions of the application represent the potential of the new press, assuming continuous operation (8760 hours per year).

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> /SMAL Levels	Existing Potential Emissions	Existing Actual Emissions (2013 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	N/D	N/D	0.021	N/A
PM ₁₀	15.0	N/D	1.71	0.021	N/A
PM _{2.5}	10.0	N/D	N/D	0.021	N/A
SOx	40.0	N/D	0.24	0.03	N/A
NOx	40.0	N/D	3.2	0.39	N/A
VOC	40.0	<245.11	18.58	25.12	³ <245.0
CO	100.0	N/D	1.85	0.22	N/A
GHG (CO ₂ e)	¹ 100,000	N/D	N/D	382.14	N/A
GHG (mass)	¹ 250.0	N/D	N/D	374.01	N/A
Chromium VI	² 0.002	N/D	N/D	N/A	N/A
Nickel Compounds	² 1.0	N/D	N/D	N/A	N/A
Methanol	10.0	N/D	N/D	N/A	N/A
Toluene	10.0	N/D	N/D	N/A	N/A
HAPs	10.0/25.0	N/D	0.0031	0.005	N/A

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

Note 1: On June 23, 2014, the U.S. Supreme Court determined, in *Utility Air Regulatory Group v. Environmental Protection Agency* (No. 12-1146), that GHG can no longer be treated as an air pollutant for the purpose of determining whether a source is a major source required to obtain a PSD permit.

Note 2: SMAL

Note 3: 245.0 tons per year limit for Mondi Jackson – Indian Creek only.

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 all pollutants are below de minimis levels.

APPLICABLE REQUIREMENTS

Mondi Jackson, Inc. 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
- *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 10-6.165

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.

Chia-Wei Young
New Source Review Unit

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated March 28, 2014, received April 7, 2014, designating Mondi Jackson, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

APPENDIX A

Abbreviations and Acronyms

%percent	m/s meters per second
°Fdegrees Fahrenheit	Mgal 1,000 gallons
acfmactual 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
COcarbon monoxide	NSPS New Source Performance Standards
CO₂carbon 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
dscfdry 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
fpsfeet per second	SCC Source Classification Code
ft feet	scfm standard cubic feet per minute
GACT Generally Available Control Technology	SIC Standard Industrial Classification
GHG Greenhouse Gas	SIP State Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
gr grains	SO_x sulfur oxides
GWP Global Warming Potential	SO₂ sulfur dioxide
HAP Hazardous Air Pollutant	tph tons per hour
hr hour	tpy tons per year
hp horsepower	VMT vehicle miles traveled
lb pound	VOC Volatile Organic Compound
lbs/hr pounds per hour	
MACT Maximum Achievable Control Technology	
µg/m³micrograms per cubic meter	

Mr. Jeff Kisner
Manager Health, Safety, and Environmental
Mondi Jackson, Inc.
14591 State Highway 177
Jackson, MO 63755

RE: New Source Review Permit - Project Number: 2014-04-017

Dear Mr. Kisner:

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, 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 Chia-Wei Young, 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:cyl

Enclosures

c: Southeast Regional Office
PAMS File: 2014-04-017

Permit Number: