



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
(AR-18J)

APR 10 1996

Mr. Dale Ziege
Bureau of Air Management
Department of Natural Resources
101 South Webster Street
Box 7921
Madison, WI 53707

Dear Mr. Ziege:

This letter is in regards to the construction permit for James River Corp. - Green Bay Mill, #96-POY-007, which was issued on March 29, 1996. This was a synthetic minor modification to an existing major source. The modification involved adding a new pulper, which then debottlenecked the deinking plant. The majority of increased emissions were Volatile Organic Compounds (VOC). The modification was given a VOC emission limit of 1.3 tons per week, averaged over 52 weeks.

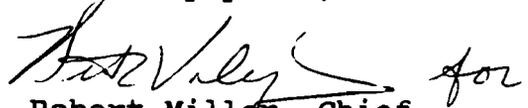
The June 13, 1989 memo entitled "Guidance on Limiting Potential to Emit in New Source Permitting" from the United States Environmental Protection Agency (EPA), states that an emission limitation alone would limit potential to emit only when it reflects the absolute maximum that the source could emit without controls or other operational restrictions. The one exception listed in the memo is for surface coating operations which use a wide variety of different coatings. The EPA believes that the deinking plant at James River is not similar to a surface coating facility. In addition, the source uses only five different additives and this does not constitute a wide variety of coatings. The EPA intends a wide variety of coatings to mean several hundred different coatings. The source has stated that they are not sure what the actual VOC emitted will be, due to the uncertainty of the recycled paper that they receive. Therefore, the EPA concludes that this limitation is not practically enforceable because the restrictions are in terms of emission rates and not operating parameters as required by the June 13, 1989 memo.

The EPA has determined that the emission limitation of 1.3 tons per week does not follow the Potential to Emit guidance. Further operational limitations should have been imposed, such as a limit on gallons used and/or a limit on the VOC content of the additives. EPA realizes that this is an issued permit, but we

trust that the Wisconsin Department of Natural Resources will take the necessary steps to ensure that this type of emission limitation is not used in future permits.

If you have any further questions regarding this letter or would like to discuss the matter further, please contact Laura Gire at (312) 886-5031.

Sincerely yours,

 for
Robert Miller, Chief
Permits and Grants Section

cc: Mr. Paul Yeung
Wisconsin Department of
Natural Resources
Permits Section