



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

JUN 15 2016

REPLY TO THE ATTENTION OF

Ms. Kristin Hart
Chief
Permits and Stationary Source Modeling Section
Bureau of Air Management
Wisconsin Department of Natural Resources
PO Box 7921
Madison, Wisconsin 53707-7921

Dear Ms. Hart:

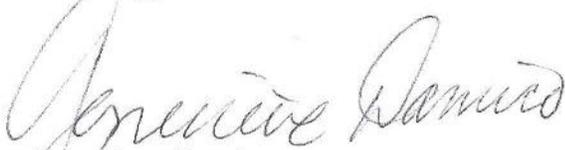
The U.S. Environmental Protection Agency has the following comments on the Wisconsin Department of Natural Resources' (WDNR) draft Title V renewal for Sonoco- US Paper Corp.- Menasha Mill (Sonoco), permit number #471031220-P30. In order to ensure that the project meets federal Clean Air Act requirements, that the permit will provide necessary information so that the basis for the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA recommends that the following points be addressed:

- 1) 40 CFR 70.5(c)(3) requires the source to provide emission-related information as part of the permit application, including all emissions of pollutants for which the source is major and emissions of all regulated air pollutants. It is unclear from the draft preliminary determination document (PD) whether particulate matter of less than 2.5 micrometers (PM_{2.5}) emissions from mechanical sources were included in the emissions estimates. On page 6 of the PD footnote 3 to the table of criteria pollutant estimates indicate that "Particulate matter of less than 10 micrometers and PM_{2.5} emissions have been assumed to be equal to Particulate Matter Emissions". However, page 8 of the PD states that, "this review does not include emissions estimates of PM_{2.5} from processes which are considered mechanical or low temperature operations." Please clarify whether the emissions estimates table on Page 6 includes PM_{2.5} emissions from mechanical sources, or otherwise ensure that the permit record contains emissions calculations for PM_{2.5} as required by Title V.
- 2) Footnote #5 on page 7 of the draft permit includes language from New Source Performance Standard (NSPS) Db that requires the facility to perform performance tests when requested by the Department. EPA believes that this language represents requirements that are intended to be federally enforceable and that it would be more appropriate to include this in the body of the permit.

- 3) Boiler B01 is subject to the requirements of 40 CFR 60 Subpart Db, however it appears that some of the applicable requirements of the NSPS were inadvertently omitted from the permit. If appropriate please revise the permit to include 40 CFR 60.44b(h), 60.44b(i), and 60.46b(c)(4) or explain why the facility is not subject to these conditions of the NSPS.

We look forward to working with you to address all of our comments. If you have any further questions, please feel free to contact Andrea Morgan, of my staff, at (312) 353-6058.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico
Chief
Air Permits Section