



December 28, 2022

Muhammed Zaman
Northcentral Regional Air Quality Program Manager
Pennsylvania Department of Environmental Protection
Northcentral Regional Office
208 W. 3rd St., Suite 101
Williamsport, PA 17701

**Re: Notification of RACT III Applicability [25 Pa. Code §129.115(a)] and Alternative RACT Compliance Analysis [25 Pa. Code §129.114(i)]
Title V Operating Permit No. 18-00030
First Quality Tissue, LLC – Castanea Township, Clinton County, PA**

Dear Mr. Zaman:

First Quality Tissue, LLC (FQT) is providing this summary of Reasonably Available Control Technology (RACT) applicability and compliance plans for its tissue products facility in Lock Haven, Pennsylvania (Facility) in accordance with the recently promulgated provisions of 25 Pa. Code §§129.111-129.115. This document represents the required notification of applicability and compliance proposal under 25 Pa. Code §129.115(a). In addition, this document includes the analysis of alternative RACT compliance required under 25 Pa. Code §129.114(i) for those sources at the Facility subject to case-by-case RACT determinations that were previously approved by the Pennsylvania Department of Environmental Protection (PADEP) under 25 Pa. Code §129.99.

Facility Background and RACT III Rule Applicability

The Facility manufactures household care products, such as toilet paper and paper towels. The Facility operates pursuant to PADEP Title V Operating Permit (TVOP) No. 18-00030.

On November 12, 2022, PADEP published 25 Pa. Code §§129.111-129.115, “Additional RACT Requirements for Major Sources of NO_x and VOCs for the 2015 Ozone NAAQS” (RACT III). The RACT III requirements or emissions limitations supersede the requirements or emissions limitations of a RACT permit previously issued in accordance with 25 Pa. Code §§129.91-129.95 and 129.96-129.100, except in cases where an existing RACT permit specifies more stringent requirements and/or emissions limitations. Compliance with applicable RACT III Rule requirements or emissions limitations must be demonstrated no later than January 1, 2023.

The RACT III Rule applies to major nitrogen oxides (NO_x) and/or major volatile organic compound (VOC) emitting facilities. 25 Pa. Code §121.1 defines major NO_x and VOC emitting facilities as follows:

- Major NO_x emitting facility – a facility-wide potential to emit (PTE) greater than 100 tons per year (tpy).
- Major VOC emitting facility – a facility-wide PTE greater than 50 tpy.

The Facility-wide NO_x and VOC PTE is greater than 100 tpy and 50 tpy, respectively, and therefore, FQT is both a major NO_x and VOC emitting facility subject to the provisions of RACT III per 25 Pa. Code §129.111(a).

Notification of Applicability and Compliance Proposal [25 Pa. Code §129.115(a)]

The following subsections provide the notification of applicability and compliance proposal required under 25 Pa. Code §129.115(a).

25 Pa. Code §129.115(a)(1) – Submission Deadline

Because the Facility was a major NO_x and VOC emitting facility prior to August 3, 2018, this submittal is being made on or before December 31, 2022, per 25 Pa. Code §129.115(a)(1)(i).

25 Pa. Code §129.115(a)(2) – Identification of Air Contamination Sources That Commenced Operation on or Before August 3, 2018

Tables A-1 and A-2 of Attachment A provide the RACT III Rule Applicability Summary, which identifies the following:

- Air contamination sources exempted from 25 Pa. Code §§129.112-129.114 because they are already subject to certain Chapter 129 RACT requirements [i.e., §§129.51, 129.52(a)-(k) and Table I categories 1-11, 129.52a-129.52e, 129.54-129.63a, 129.64-129.69, 129.71-129.75, 129.77, and 129.101-129.107].
- Air contamination sources exempted from 25 Pa. Code §§129.112-129.114 because they commenced operation after August 3, 2018.
- Air contamination sources exempted from 25 Pa. Code §§129.112-129.114 because they have a PTE less than 1.0 tpy of NO_x or VOC.
- Air contamination sources subject to a presumptive RACT requirement or RACT emissions limitation in 25 Pa. Code §129.112.
- Air contamination sources subject to an alternative RACT requirement or RACT emissions limitation under 25 Pa. Code §129.114.

25 Pa. Code §129.115(a)(3) – Identification of Air Contamination Sources That Commenced Operation After August 3, 2018

The following is a list of sources that commenced operation after August 3, 2018:

- #3 Paper Machine Boiler (Source ID 035)
- #3 Paper Machine Unit Heaters & Air Make-Up Units (Source ID 036)
- #3 Paper Machine Wet-End (Source ID P301)
- #3 Paper Machine Wet-End Dryer/Glue Containment Area (Source ID P302)
- #3 Paper Machine Dry-End Dryer (Source ID P303)
- #3 Paper Machine Dry-End (Source ID P304)
- #3 Paper Machine DAF Clarifier (Source ID P305)
- #3 Paper Machine Converting Area (Source ID P306)
- #3 Paper Machine Storage Tanks (Source ID P307)

25 Pa. Code §129.115(a)(4) – Identification of Air Contamination Sources That Emit Less Than 1 Ton Per Year

Table B-1 of Attachment B provides emissions calculations for all sources at the Facility that emit less than 1.0 tpy of VOC. There are no combustion sources at the Facility that emit less than 1.0 tpy of NO_x.

25 Pa. Code §129.115(a)(5) – Air Contamination Source Information (Commenced Operation on or Before August 3, 2018)

Table A-3 of Attachment A provides a Source Inventory that includes a description, make, model, and location (as available) of each air contamination source subject to the RACT III Rule. The applicable RACT requirement or RACT emissions limitation for each source is provided in the RACT III Rule Applicability Summary as Tables A-1 and A-2 of Attachment A.

The Printing Line (Source ID P109) was exempt from the final-form rulemaking of 25 Pa. Code §§129.96-129.100 published by PADEP [“Additional RACT Requirements for Major Sources of NO_x and VOCs” (RACT II)] per 25 Pa. Code §129.96(a) since it was subject to a rule listed in this section. However, FQT has determined that this source emits less than 1.0 tpy of VOC. Therefore, Source ID P109 is now exempt per 25 Pa. Code §129.111(c).

#1 Paper Machine Wet-End (Source ID P101) and #2 Paper Machine Wet-End (Source ID P201) were each subject to case-by-case RACT determinations under the RACT II Rule, due to their PTE greater than 2.7 tpy of VOC. However, FQT has accepted a limitation of 2.7 tpy of VOC, which is reflected in TVOP No. 18-00030. Source IDs P101 and P201 now have a PTE less than 2.7 tpy of VOC and are now subject to the presumptive RACT requirements. In accordance with 25 Pa. Code §129.112(c)(2), these sources will be operated in accordance with good operating practices and manufacturer specifications.

25 Pa. Code §129.115(a)(6) – Air Contamination Source Information (Commenced Operation After August 3, 2018)

The Source Inventory provided in Table A-3 of Attachment A includes each source that commenced operation after August 3, 2018. The Source Inventory includes a description, make, model, and location (as available) of each of these sources.

25 Pa. Code §129.115(a)(7) – Air Contamination Source Information (Sources That Emit Less Than 1 Ton Per Year)

The Source Inventory provided in Table A-3 of Attachment A includes each source that emits less than 1.0 tpy of VOC. The Source Inventory includes a description, make, model, and location (as available) of each of these sources. There are no sources at the Facility that emit less than 1.0 tpy of NO_x.

25 Pa. Code §129.115(b) – Demonstration of Compliance by Monitoring or Testing Procedures

N/A – sections (b)(1) through (b)(5) are not applicable because the Facility does not maintain a continuous emissions monitoring system (CEMS) for any air contamination source subject to a NO_x or VOC RACT requirement or a NO_x or VOC RACT emission limitation under §129.112.

Section (b)(6) is not applicable to Sources 032, P101, P112, and P201 because these sources are only subject to work practice standards under §129.112(c) and there are no applicable emission limitations that require testing to demonstrate compliance for these sources.

Section (b)(6) is not applicable to Sources P103, P110, and P203 because these sources are subject to §129.114, not §129.112.

Sources 033, 034, P102, and P202 currently conduct stack testing for NO_x and VOC every five years per the current air permit requirements. The Facility will continue to comply with the testing requirements of this section per the current permit conditions which require periodic testing every five years.

Analysis of Alternative RACT Compliance [25 Pa. Code §129.114(i)]

Several affected sources will meet the RACT III requirements by completing a case-by-case RACT determination. Table 1 summarizes the sources subject to case-by-case RACT determinations.

**Table 1
Summary of Sources that Require Case-By-Case RACT Determinations**

Source ID	Source Name	Pollutant	RACT III Citation
P102	#1 Paper Machine Dryers	VOC	25 Pa. Code §129.114(c)
P103	#1 Paper Machine Glue Containment Area	VOC	25 Pa. Code §129.114(c)
P110	Wastewater Treatment Operation	VOC	25 Pa. Code §129.114(c)
P202	#2 Paper Machine Dryers	VOC	25 Pa. Code §129.114(c)
P203	#2 Paper Machine Glue Containment Area	VOC	25 Pa. Code §129.114(c)

In accordance with 25 Pa. Code §129.114(i), an alternative RACT proposal, as required under 25 Pa. Code §129.114(d), is not necessary if the source in question was in operation prior to

October 24, 2016, has not been modified or changed since October 24, 2016, and does not fall into one of the presumptive source categories subject to 25 Pa. Code §§129.112(c)(11) or (i)-(k). Source IDs P102, P103, P110, P202, and P203 meet the stated criteria and therefore, this letter serves as a demonstration that FQT can maintain compliance with the alternative RACT requirements and/or emissions limitations previously approved as RACT by PADEP.

The following subsections provide the analysis of the alternative RACT compliance under 25 Pa. Code §129.114(i) for Source IDs P102, P103, P110, P202, and P203.

25 Pa. Code §129.114(i)(1)(i)(A) – Identification of New Air Cleaning Devices, Air Pollution Control Technologies, or Techniques

FQT conducted an analysis of the RACT/Best Available Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) Clearinghouse (RBLC) to determine if any new air cleaning device, air pollution control technologies, or techniques could be applied to the units onsite. A summary of the RBLC search results is provided in Attachment C. No new air cleaning devices, air pollution control technologies, or techniques were discovered and the current emissions controls for the RACT III affected units are consistent with recent and historical BACT determinations. Furthermore, FQT contacted an air pollution control device vendor and determined that no significant or fundamentally different VOC control devices or technologies have come into existence since the previous alternative RACT submittal.

25 Pa. Code §129.114(i)(1)(i)(B) – List Previously-Identified Technically Feasible Controls

Table 2 provides a list of technically feasible air pollution control technologies previously examined under 25 Pa. Code §§129.92(b)(1) through (3) and included in the written RACT proposal submitted under 25 Pa. Code §129.99(d) as well as the RACT control measures that have been previously approved by PADEP under RACT II.

**Table 2
Technically Feasible Air Pollution Control Technologies Approved Under RACT II**

Source ID	Source Name	Pollutant	Control Technology Option
P102	#1 Paper Machine Dryers	VOC	Good Operating Practices
P103	#1 Paper Machine Glue Containment Area	VOC	Good Operating Practices
P110	Wastewater Treatment Operation	VOC	Low VOC Chemicals and Additives
P202	#2 Paper Machine Dryers	VOC	Good Operating Practices
P203	#2 Paper Machine Glue Containment Area	VOC	Good Operating Practices

25 Pa. Code §129.114(i)(1)(i)(C) – Summary of Previous Economic Feasibility Analyses

FQT determined no add-on air pollution control technologies were technically feasible in its 25 Pa. Code §129.99(d) submittal. Therefore, no economic feasibility analysis was completed.

25 Pa. Code §129.115(i)(1)(i)(D) – Statement of Economic Infeasibility

FQT determined that no add-on air pollution control technologies were technically feasible in its 25 Pa. Code §129.99(d) submittal. Therefore, no add-on air pollution control technologies are economically feasible.

25 Pa. Code §129.114(i)(1)(i)(E) – Additional Information

Upon request from PADEP, FQT will provide additional information to support the Alternative RACT Compliance Analysis included herein.

Alternative RACT Compliance Summary

Based on the 25 Pa. Code §129.114(i) analysis provided above, FQT has determined that the alternative RACT requirements and/or RACT emissions limitations that were previously approved by PADEP under 25 Pa. Code §129.99(e) continue to represent RACT for each source evaluated. FQT proposes to comply with the RACT III Rule by continuing to comply with the applicable RACT conditions of the current TVOP No. 18-00030. Thus, FQT will meet the January 1, 2023, compliance deadline of the RACT III Rule through continued compliance with these conditions.

Source IDs P102 and P202 – Paper Machine Dryers

The Paper Machine Dryers (Source IDs P102 and P202) remove water remaining in the sheet by heating it until it evaporates. Heat is provided by direct-transfer from the combustion of natural gas or propane. The units have multiple dryers attached with a combined total heat capacity of 142 MMBtu/hr for each unit. FQT evaluated and determined that thermal oxidation, condensation/refrigeration, and absorption were not technically feasible methods of controlling VOC emissions in its 25 Pa. Code §129.99(d) submittal previously approved by PADEP. Therefore, FQT proposes continuing to operate Source IDs P102 and P202 in accordance with its existing emissions restrictions and using good operating practices and manufacturer specifications as RACT.

Source IDs 103 and 203 – Paper Machine Glue Containment Areas

FQT also evaluated thermal oxidation, condensation/refrigeration, and absorption as possible technologies for controlling VOC emissions from the Paper Machine Glue Containment Areas (Source IDs P103 and P203) in its 25 Pa. Code §129.99(d) submittal. However, it also determined that these control technologies were not technically feasible for the same reasons that these control technologies were not technically feasible for Source IDs P102 and P202. Therefore, FQT proposes continuing to operate Source IDs P103 and P203 in accordance with its existing emissions restrictions and using good operating practices and manufacturer specification as RACT.

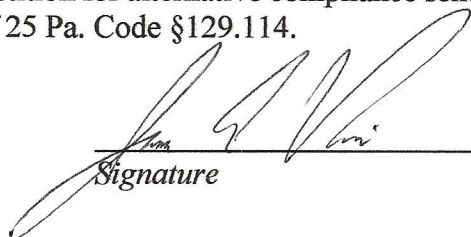
Source ID P110 – Wastewater Treatment Operation

The Wastewater Treatment Operation (Source ID P110) includes a primary clarifier unit, an aeration stabilization basin, and a sludge dewatering press and emits VOCs as fugitives. FQT determined that no add-on control device would be technically feasible because emissions from Source ID P110 are fugitive and come from several areas at different times in its 25 Pa. Code §129.99(d) submittal previously approved by PADEP. Therefore, FQT proposes the continued use of low-VOC chemicals and additives as RACT.

Certification of Alternative RACT Compliance Analysis

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this 25 Pa. Code §129.114(i) Alternative RACT Compliance Analysis are true, accurate, and complete. Furthermore, the Alternative RACT Compliance Analysis previously approved by PADEP under 25 Pa. Code §129.99(e) (relating to alternative RACT proposal and petition for alternative compliance schedule) assures compliance with the applicable provisions of 25 Pa. Code §129.114.

James Vaiana – Environmental Director
Responsible Official Name

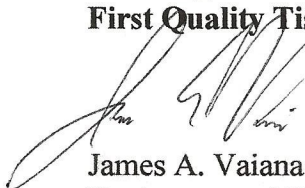

Signature

RACT III Rule Recordkeeping

In accordance with 25 Pa. Code §129.115(f), FQT will keep sufficient records for demonstrating compliance with the RACT III Rule, including continued compliance with RACT-specific recordkeeping conditions. Also, per 25 Pa. Code §129.115(k), all records will be maintained for at least five years, and will be made available to PADEP upon receipt of a written request.

Should you have any questions about this submittal, please feel free to contact James A. Vaiana at (570) 893-7242 or jvaiana@firstquality.com.

Sincerely,
First Quality Tissue, LLC



James A. Vaiana
Environmental Director

- Attachment A – RACT III Rule Applicability and Compliance Summary
- Attachment B – Emissions Calculations
- Attachment C – RBLC Search Results

**ATTACHMENT A -
RACT III RULE APPLICABILITY AND COMPLIANCE SUMMARY**

**Table A-1
RACT III Rule Applicability - NO_x
First Quality Tissue, LLC - Lock Haven, PA**

Source ID	Source Designation	RACT III Applicability			
		Classification	RACT III Citation	Limitation/Requirement	Proposed Actions for Demonstrating Compliance
032	Unit Heaters & Air Make-Up Units	Combustion source with an individual rated gross heat input <20 MMBtu/hr	25 Pa. Code §129.112(c)(4)	Presumptive - Install, maintain, and operate in accordance with manufacturer specifications and good operating practices.	FQT will demonstrate compliance by maintaining the source in accordance with manufacturer specifications and good operating practices.
033	#1 Paper Machine Boiler	Natural gas/propane-fired combustion unit with a rated heat input ≥50 MMBtu/hr	25 Pa. Code §129.112(g)(1)(i)	Presumptive - Comply with 0.10 lb NO _x /MMBtu heat input.	FQT will demonstrate compliance by limiting the source's emissions to 0.10 lb NO _x /MMBtu.
034	#2 Paper Machine Boiler	Natural gas/propane-fired combustion unit with a rated heat input ≥50 MMBtu/hr	25 Pa. Code §129.112(g)(1)(i)	Presumptive - Comply with 0.10 lb NO _x /MMBtu heat input.	FQT will demonstrate compliance by limiting the source's emissions to 0.10 lb NO _x /MMBtu.
035	#3 Paper Machine Boiler	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for NO _x because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).
036	#3 Paper Machine Unit Heaters & Air Make-Up Units	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for NO _x because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).
P102	#1 Paper Machine Dryers	Natural gas/Propane-fired combustion unit with a rated heat input ≥50 MMBtu/hr	25 Pa. Code §129.112(g)(1)(i)	Presumptive - Comply with 0.10 lb NO _x /MMBtu heat input.	FQT will demonstrate compliance by limiting the source's emissions to 0.10 lb NO _x /MMBtu.
P112	Diesel Fire Pump	NO _x air contamination source with PTE <5 ton/yr NO _x	25 Pa. Code §129.112(c)(1)	Presumptive - Install, maintain, and operate in accordance with manufacturer specifications and good operating practices.	FQT will demonstrate compliance by maintaining the source in accordance with manufacturer specifications and good operating practices.
P202	#2 Paper Machine Dryers	Natural gas/Propane-fired combustion unit with a rated heat input ≥50 MMBtu/hr	25 Pa. Code §129.112(g)(1)(i)	Presumptive - Comply with 0.10 lb NO _x /MMBtu heat input.	FQT will demonstrate compliance by limiting the source's emissions to 0.10 lb NO _x /MMBtu.
P302	#3 Paper Machine Wet-End Dryer/Glue Containment Area	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for NO _x because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).
P303	#3 Paper Machine Dry-End Dryer	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for NO _x because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).

Table A-2
RACT III Rule Applicability - VOC
First Quality Tissue, LLC - Lock Haven, PA

Source ID	Source Designation	RACT III Applicability			Proposed Actions for Demonstrating Compliance
		Classification	RACT III Citation	Limitation/Requirement	
032	Unit Heaters & Air Make-Up Units	N/A - Pursuant to 25 Pa. Code §129.111(c), exempt for VOC because emissions are <1.0 ton/yr .			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(4).
033	#1 Paper Machine Boiler	VOC air contamination source with PTE <2.7 ton/yr VOC	25 Pa. Code §129.112(c)(2)	Presumptive - Install, maintain, and operate in accordance with manufacturer specifications and good operating practices.	FQT will demonstrate compliance by maintaining the source in accordance with manufacturer specifications and good operating practices.
034	#2 Paper Machine Boiler	VOC air contamination source with PTE <2.7 ton/yr VOC	25 Pa. Code §129.112(c)(2)	Presumptive - Install, maintain, and operate in accordance with manufacturer specifications and good operating practices.	FQT will demonstrate compliance by maintaining the source in accordance with manufacturer specifications and good operating practices.
035	#3 Paper Machine Boiler	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for VOC because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).
036	#3 Paper Machine Unit Heaters & Air Make-Up Units	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for VOC because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).
P101	#1 Paper Machine Wet-End	VOC air contamination source with PTE <2.7 ton/yr VOC	25 Pa. Code §129.112(c)(2)	Presumptive - Install, maintain, and operate in accordance with manufacturer specifications and good operating practices.	FQT will demonstrate compliance by maintaining the source in accordance with manufacturer specifications and good operating practices.
P102	#1 Paper Machine Dryers	VOC air contamination source emitting >2.7 tons/yr of VOC	25 Pa. Code §129.114(c)	Case-by-Case Determination	FQT will complete a case-by-case determination, included in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.114(i).
P103	#1 Paper Machine Glue Containment Area	VOC air contamination source emitting >2.7 tons/yr of VOC	25 Pa. Code §129.114(c)	Case-by-Case Determination	FQT will complete a case-by-case determination, included in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.114(i).
P105	#1 Paper Machine Dry-End	N/A - Pursuant to 25 Pa. Code §129.111(c), exempt for VOC because emissions are <1.0 ton/yr .			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(4).
P106	#1 Paper Machine DAF Clarifier	N/A - Pursuant to 25 Pa. Code §129.111(c), exempt for VOC because emissions are <1.0 ton/yr .			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(4).
P108	Adhesive Operation	N/A - Pursuant to 25 Pa. Code §129.111(a), exempt for VOC based on applicability to §129.77.			N/A
P109	Printing Operation	N/A - Pursuant to 25 Pa. Code §129.111(c), exempt for VOC because emissions are <1.0 ton/yr .			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(4).
P110	Wastewater Treatment Operation	VOC air contamination source emitting >2.7 tons/yr of VOC	25 Pa. Code §129.114(c)	Case-by-Case Determination	FQT will complete a case-by-case determination, included in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.114(i).
P111	Storage Tanks	N/A - Pursuant to 25 Pa. Code §129.111(c), exempt for VOC because emissions are <1.0 ton/yr .			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(4).
P112	Diesel Fire Pump	N/A - Pursuant to 25 Pa. Code §129.111(c), exempt for VOC because emissions are <1.0 ton/yr .			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(4).
P201	#2 Paper Machine Wet-End	VOC air contamination source with PTE <2.7 ton/yr VOC	25 Pa. Code §129.112(c)(2)	Presumptive - Install, maintain, and operate in accordance with manufacturer specifications and good operating practices.	FQT will demonstrate compliance by maintaining the source in accordance with manufacturer specifications and good operating practices.

Table A-2
RACT III Rule Applicability - VOC
First Quality Tissue, LLC - Lock Haven, PA

Source ID	Source Designation	RACT III Applicability			Proposed Actions for Demonstrating Compliance
		Classification	RACT III Citation	Limitation/Requirement	
P202	#2 Paper Machine Dryers	VOC air contamination source emitting >2.7 tons/yr of VOC	25 Pa. Code §129.114(c)	Case-by-Case Determination	FQT will complete a case-by-case determination, included in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.114(i).
P203	#2 Paper Machine Glue Containment Area	VOC air contamination source emitting >2.7 tons/yr of VOC	25 Pa. Code §129.114(c)	Case-by-Case Determination	FQT will complete a case-by-case determination, included in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.114(i).
P205	#2 Paper Machine Dry-End	N/A - Pursuant to 25 Pa. Code §129.111(c), exempt for VOC because emissions are <1.0 ton/yr .			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(4).
P206	#2 Paper Machine DAF Clarifier	N/A - Pursuant to 25 Pa. Code §129.111(c), exempt for VOC because emissions are <1.0 ton/yr .			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(4).
P301	#3 Paper Machine Wet-End	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for VOC because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).
P302	#3 Paper Machine Wet-End Dryer/Glue Containment Area	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for VOC because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).
P303	#3 Paper Machine Dry-End Dryer	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for VOC because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).
P304	#3 Paper Machine Dry-End	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for VOC because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).
P305	#3 Paper Machine DAF Clarifier	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for VOC because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).
P306	#3 Paper Machine Converting Area	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for VOC because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).
P307	#3 Paper Machine Storage Tanks	N/A - Pursuant to 25 Pa. Code §129.111(b), exempt for VOC because the source commenced operation after August 3, 2018.			FQT will demonstrate compliance by stating the source's exempt status in the RACT III Initial Notification, in accordance with 25 Pa. Code §129.115(a)(3).

**Table A-3
NO_x and VOC Source Inventory
First Quality Tissue, LLC - Lock Haven, PA**

Source ID	Source Designation	Fuel/Throughput Material	Make	Model	Location
032	Unit Heaters & Air Make-Up Units	Natural Gas/Propane	Various	Various	Throughout Site
033	#1 Paper Machine Boiler	Natural Gas/Propane	Babcock and Wilcox	FM 10-79	Utility Bldg. 1
034	#2 Paper Machine Boiler	Natural Gas/Propane	Babcock and Wilcox	FM 10-79	Utility Bldg. 2
035	#3 Paper Machine Boiler	Natural Gas/Propane	Babcock and Wilcox	FM 10-79	Utility Bldg. 3
036	#3 Paper Machine Unit Heaters & Air Make-Up Units	Natural Gas/Propane	Various	Various	Throughout Site
P101	#1 Paper Machine Wet End	N/A	Voith Andritz Tissue	Custom	Paper Machine Bldg. 1
P102	#1 Paper Machine Dryers	Natural Gas/Propane	Voith Andritz Tissue	Custom	Paper Machine Bldg. 1
P103	#1 Paper Machine Glue Containment Area	N/A	Voith Andritz Tissue	Custom	Paper Machine Bldg. 1
P105	#1 Paper Machine Dry-End	N/A	Voith Andritz Tissue	H842 34-3 GEH	Paper Machine Bldg. 1
P106	#1 Paper Machine DAF Clarifier	N/A	Voith Andritz Tissue	Custom	Paper Machine Bldg. 1
P108	Adhesive Operation	N/A	N/A	N/A	Paper Machine Bldg. 1
P109	Printing Operation	N/A	Videojet	Various	Paper Machine Bldg. 1
P110	Wastewater Treatment Operation	N/A	N/A	N/A	Converting Buildings 1 and 2
P111	Storage Tanks	N/A	N/A	N/A	Paper Machine Basements
P112	Diesel Fire Pump	Diesel	Detroit Diesel	DDFP08FH	Fire Water Tank
P201	#2 Paper Machine Wet End	N/A	Voith Andritz Tissue	Custom	Paper Machine Bldg. 2
P202	#2 Paper Machine Dryers	Natural Gas/Propane	Voith Andritz Tissue	Custom	Paper Machine Bldg. 2
P203	#2 Paper Machine Glue Containment Area	N/A	Voith Andritz Tissue	Custom	Paper Machine Bldg. 2
P205	#2 Paper Machine Dry-End	N/A	Voith Andritz Tissue	H842 34-3 GEH	Paper Machine Bldg. 2
P206	#2 Paper Machine DAF Clarifier	N/A	Voith Andritz Tissue	Custom	Paper Machine Bldg. 2
P301	#3 Paper Machine Wet End	N/A	Voith Andritz Tissue	Custom	Paper Machine Bldg. 3
P302	#3 Paper Machine Wet End Dryer/Glue Containment Area	Natural Gas/Propane	Voith Andritz Tissue	Custom	Paper Machine Bldg. 3
P303	#3 Paper Machine Dry-End Dryer	Natural Gas/Propane	Voith Andritz Tissue	Custom	Paper Machine Bldg. 3
P304	#3 Paper Machine Dry-End	N/A	Voith Andritz Tissue	H842 34-3 GEH	Paper Machine Bldg. 3
P305	#3 Paper Machine DAF Clarifier	N/A	Voith Andritz Tissue	Custom	Paper Machine Bldg. 3
P306	#3 Paper Machine Converting Area	N/A	Voith Andritz Tissue	Custom	Paper Machine Bldg. 3
P307	#3 Paper Machine Storage Tanks	N/A	N/A	N/A	Paper Machine Bldg. 3

**ATTACHMENT B -
EMISSIONS CALCULATIONS**

Table B-1
Potential to Emit Calculations for Sources Exempt per 25 Pa. Code §129.111(c)

Source ID	Source Name	Rating (MMBTU/hr)	Fuel	AP-42 Factor (lb VOC / 10 ⁶ cf)	Maximum Gas Usage per Year (MMCF)	Tons VOC/yr
032	Unit Heaters & Air Make-Up Units	126.055	Natural Gas	5.5	326	0.90

Source ID	Source Name	Rating (VOC lbs/hr)	Hours per Year	Tons VOC/yr
P106	#1 Paper Machine DAF Clarifier	0.15	8,760	0.657
P206	#2 Paper Machine DAF Clarifier	0.15	8,760	0.657

Source ID	Source Name	Material	Material Usage (gal/yr)	Material VOC Content (lb/gal)	Tons VOC/yr
P109	Printing Operation	Ink	170	3.18	0.97
		Solvent	510	2.63	
		Cleaning Solution	30	1.97	

Source ID	Source Name	Rating (hp)	Fuel	AP-42 Factor (lb/hp-hr)	Maximum Hours of Operation	Tons VOC/yr
P112	Diesel Fire Pump	300.000	Diesel	0.0025	500.0	0.19

Source ID	Source Name	Glue Usage (gal/yr)	Glue VOC Content (lb/gal)	Tons VOC/yr
P105	#1 Paper Machine Dry-End	250	1.52	0.19
P205	#2 Paper Machine Dry-End			

* Source ID P111 storage tanks has negligible VOC emissions. The total permit limit for the 12 storage tanks is 0.07 tpy.

**ATTACHMENT C -
RBLC SEARCH RESULTS**

Table C-1
RBLC Search Results Summary
First Quality Tissue, LLC - Lock Haven, PA

RBL/CD	Facility Name	Facility State	Permit Number	Permit Issuance Date	Process Name	Process Type	Primary Fuel	Throughput	Throughput Unit	Process Notes	Pollutant	Control Method Code	Control Method Description	Emission Limit 1	Emission Limit 1 Unit	Emission Limit 1 Average Time Condition	Emission Limit 2	Emission Limit 2 Unit	Emission Limit 2 Average Time Condition
AR-0161	SUN BIO MATERIAL COMPANY	AR	2384-AOP-R0	9/23/2019	Recovery Boiler	30.211	Black Liquor Solids	2900	MMBtu/H	--	Volatile Organic Compounds (VOC)	P	Good Combustion Practices	10	PPMVD @ 8% O2	3 1-HOUR TESTS	0	--	--
AR-0161	SUN BIO MATERIAL COMPANY	AR	2384-AOP-R0	9/23/2019	Lime Kiln	30.231	Natural Gas	225	MMBtu/hr	--	Volatile Organic Compounds (VOC)	P	Good Combustion Practices	25	PPMVD @ 10% O2	3 1-HOUR TESTS	0	--	--
AR-0161	SUN BIO MATERIAL COMPANY	AR	2384-AOP-R0	9/23/2019	Boiler Machines	30.241	--	0		--	Volatile Organic Compounds (VOC)	P	No wet end slurry additives will be used	0.51	LB/ADTFP	--	0	--	--
AR-0161	SUN BIO MATERIAL COMPANY	AR	2384-AOP-R0	9/23/2019	Power Boiler	11.12	Biomass	1200	MMBtu/H	Fueled by biomass residuals from other portions of the plant supplemented by natural gas and dewatered sludge from the wastewater treatment plant.	Volatile Organic Compounds (VOC)	A	Oxidation Catalyst	0.01	LB/MMBTU	--	0	--	--
AR-0161	SUN BIO MATERIAL COMPANY	AR	2384-AOP-R0	9/23/2019	Emergency Engines	17.11	Diesel	0		--	Volatile Organic Compounds (VOC)	P	Good Operating Practices, limited hours of operation. Compliance with NSPS Subpart IIIH	1.9	GKW-HR	--	0	--	--
KY-0111	PHOENIX PAPER WICKLIFFE LLC	KY	V-11-051 R3	12/18/2019	#1 Power Boiler	11.31	natural gas	325	MMBtu/H	EP 01: #1 Power Boiler: Rated short term capacity ~250,000 lb steam/h Original construction date: July 1970, modified in 2019 The #1 power boiler is subject to NOx emission limit of 53.04 lb/smcf on a 3-hour average and 75.05 tons/year on a 12-month rolling average. The #1 power boiler is also subject to CO emission limit of 118.8 tons/year on a 12-month rolling average.	Volatile Organic Compounds (VOC)	P	i. Use of natural gas only; ii. Good combustion practices; and iii. Follow manufacturer's procedures for start-up and shutdown	5.5	LB/MMSCF	--	7.78	TONS/YEAR	12-MONTH ROLLING FOR #1 POWER BOILER
KY-0111	PHOENIX PAPER WICKLIFFE LLC	KY	V-11-051 R3	12/18/2019	OCC recycle Plant	30.49	--	1000	air-dried pulp/day each	There are 3 OCC Plants: EP 75: OCC Plant No. 1; EP 76: OCC Plant No. 2 AND EP 77: OCC Plant No. 3 EACH Including associated OCC pulp steam dryer	Volatile Organic Compounds (VOC)	P	i. Good operating practices; ii. Use of low-VOC or non-VOC containing materials and additives; and iii. New Chemical Approval Process.	5	TON/YEAR	12-MONTH ROLLING OVER 3 OCC RECYCLE PLA	268.3	TONS/YEAR	12-MONTH ROLLING OVER 3PULP STEAM DRYERS
KY-0111	PHOENIX PAPER WICKLIFFE LLC	KY	V-11-051 R3	12/18/2019	#2 Power Boiler	11.31	natural gas	325	MMBtu/H	EP 02: #2 Power Boiler: Rated short term capacity ~250,000 lb steam/h Original construction date: July 1970, modified in 2019 The #2 power boiler is subject to NOx emission limit of 125.5 lb/smcf on a 3-hour average and 56.8 tons/year on a 12-month rolling average. The #2 power boiler is also subject to CO emission limit of 38.0 tons/year on a 12-month rolling average.	Volatile Organic Compounds (VOC)	P	i. Use of natural gas only; ii. Good combustion practices; and iii. Follow manufacturer's procedures for start-up and shutdown	5.5	LB/MMSCF	--	2.5	TONS/YEAR	12-MONTH ROLLING FOR #2 POWER BOILER
KY-0111	PHOENIX PAPER WICKLIFFE LLC	KY	V-11-051 R3	12/18/2019	Paper Machine System	30.241	--	67	tons/h (short term)	The paper machine system includes all paper machine process equipment. The paper machine system can utilize old converted container (OCC) recycle pulp, unbleached kraft pulp, and bleached kraft pulp. Initial installation date: January 1970, modified 2019 EP 64 Paper Machine System	Volatile Organic Compounds (VOC)	P	i. Good operating practices; ii. Use of low-VOC or non-VOC containing materials and additives; and iii. New Chemical Approval Process.	246.9	TON/YEAR	12-MONTH ROLLING	0	--	--
LA-0322	ST. FRANCISVILLE MILL	LA	PSD-LA-540(MS)	5/11/2017	Paper Machine No. 1	30.241	--	375000	ADTFP/year	--	Volatile Organic Compounds (VOC)	P	Good operating practices, including the use of low-VOC additives	0	--	--	0	--	--
*PA-0313	FIRST QUALITY TISSUE LOCK HAVEN PLT	PA	18-00030C	07/27/2017	PAPER MACHINE CONVERTING AREA	30.42	--	0		--	Volatile Organic Compounds (VOC)	A	Scrubber	3.48	TPY	--	0	--	--
WI-0266	GREEN BAY PACKAGING, INC. - SHIPPING CONTAINER DIVISION	WI	18-DMM-077	09/06/2018	Corrugator No. 4 (Fugitive F61)	30.42	--	1500	ft/min	110-inch web width	Volatile Organic Compounds (VOC)	P	Use of Low VOC coating and additives: Average VOC content of all VOC-containing materials may not exceed 0.15% by weight, as applied on a monthly basis.	2.57	TON/MONTH	--	0	--	--
WI-0266	GREEN BAY PACKAGING, INC. - SHIPPING CONTAINER DIVISION	WI	18-DMM-077	09/06/2018	Natural gas-fired boiler (Boiler B01)	13.31	Natural Gas	35	MMBtu/H	--	Volatile Organic Compounds (VOC)	P	Good combustion practices, use only natural gas, equip boiler with Low NOx burners and flue gas recirculation	0.0055	LB/MMBTU	--	0	--	--
WI-0266	GREEN BAY PACKAGING, INC. - SHIPPING CONTAINER DIVISION	WI	18-DMM-077	09/06/2018	Space heaters (process P53)	19.6	Natural gas	40	MMBtu/H	--	Volatile Organic Compounds (VOC)	P	Good combustion practices, use only natural gas, equip with Low NOx burners	0.0055	LB/MMBTU	--	0	--	--
WI-0267	GREEN BAY PACKAGING, INC. - MILL DIVISION	WI	18-DMM-090	09/06/2018	Paper Machine No. 4 and Pulping Operations (process P10)	30.42	--	1935	ton air dried paper/day	--	Volatile Organic Compounds (VOC)	P	Use of low VOC containing additives, cleaners and biocides	1.7	LB/ADTFP	12-MONTH AVERAGE	59	TON/MONTH	12-MONTH AVERAGE
WI-0267	GREEN BAY PACKAGING, INC. - MILL DIVISION	WI	18-DMM-090	09/06/2018	Two Natural Gas-Fired Boilers (Boilers B34 and B35)	11.31	Natural Gas	285	MMBtu/H	Heater input is per boiler. Boilers also can fire biogas from anaerobic digester	Volatile Organic Compounds (VOC)	P	Good combustion practices, only fire natural gas and/or biogas, equip boilers with low NOx burners and flue gas recirculation.	0.0055	LB/MMBTU	--	0	--	--
WI-0267	GREEN BAY PACKAGING, INC. - MILL DIVISION	WI	18-DMM-090	09/06/2018	Two Emergency Generators (P38 and P39)	17.23	Natural gas	50	kW	Each generator is 50 kW (80 HP). Note that the VOC and GHG BACT conditions were inadvertently left out of the permit and were added through construction permit 19-DM-001	Volatile Organic Compounds (VOC)	P	Meet 40 CFR 60, Subpart JJJ, limit operation to no more than 200 hr/yr	0	--	--	0	--	--
WI-0267	GREEN BAY PACKAGING, INC. - MILL DIVISION	WI	18-DMM-090	09/06/2018	Anaerobic Digester with a flare (Process P40)	19.32	Biogas	29	MMBtu/H	--	Volatile Organic Compounds (VOC)	B	Biogas produced by digester must be combusted in flare or a boiler. Flare shall be designed to have a minimum destruction removal and efficiency of at least 99%, good combustion practices	0.005	LB/MMBTU	--	0	--	--
WI-0268	ND PAPER, INC. - BIRON DIVISION	WI	18-DMM-145	02/19/2019	Boiler B26 - Natural gas/biogas-fired boiler	12.31	Natural Gas or Biogas	233	MMBtu/H	Boiler can burn natural gas and/or biogas generated from wastewater anaerobic digester	Volatile Organic Compounds (VOC)	P	Good combustion practices. Use only natural gas and/or biogas, low-NOx burners with flue gas recirculation	0.0054	LB/MMBTU	--	0	--	--
WI-0268	ND PAPER, INC. - BIRON DIVISION	WI	18-DMM-145	02/19/2019	P50 & P30 - Paper Machine 25 and pulper	30.42	--	770	ton/day	--	Volatile Organic Compounds (VOC)	P	Use of low VOC-containing materials	1	LB VOC/ADTFP	12-MONTH AVG	4.1	TON VOC/MONTH	12-MONTH AVG
WI-0268	ND PAPER, INC. - BIRON DIVISION	WI	18-DMM-145	02/19/2019	P31 & P32 - Pulp dryer and pulper	30.49	--	1320	ton/day	--	Volatile Organic Compounds (VOC)	P	Use of low VOC containing materials	1	LB VOC/ADTFP	12-MONTH AVG	7.1	TON VOC/MONTH	12-MONTH AVG
WI-0268	ND PAPER, INC. - BIRON DIVISION	WI	18-DMM-145	02/19/2019	P34 - Anaerobic Digester and Flare	19.32	biogas	29.4	MMBtu/H	700 scfm of biogas	Volatile Organic Compounds (VOC)	B	Combust biogas in flare or boiler, flare designed to have VOC destruction and removal efficiency (DRE) of 99%. Good combustion practices: performing inspections and maintenance of flare as recommended by manufacturer	0.005	LB VOC/MMBTU	--	0	--	--
WI-0301	GEORGIA PACIFIC BROADWAY LLC	WI	21-NCW-144	11/10/2021	Converting Operations (P45)	30.49	--	0	--	Process P45 represents all existing converting equipment at the facility plus three new converting lines.	Volatile Organic Compounds (VOC)	P	Use low-VOC containing materials	0.79	TMO	AVG OVER CONSECUTIVE 12-MONTH	2.9	LB/G	EXCLUDING WATER, AS-APPLIED
WI-0301	GEORGIA PACIFIC BROADWAY LLC	WI	21-NCW-144	11/10/2021	Paper Machine (P60)	30.42	Natural gas	170	MMBtu/H	291 ton/day (94,820 tons/yr) Paper Machine with 170 MMBtu/hr combined design capacity and minimum orientation.	Volatile Organic Compounds (VOC)	P	Use of low-VOC containing materials	1.22	LB VOC/ADTFP	AVG. CONSECUTIVE 12-MONTHS	5.16	TMO	AVG. CONSECUTIVE 12-MONTHS
LA-0214	INDORAMA LAKE CHARLES FACILITY	LA	PSD-LA-813	08/03/2016	wastewater treatment system	22.2	--	0	--	--	Volatile Organic Compounds (VOC)	P	Complying with 40 CFR 63 Subpart XX	0	--	--	0	--	--
LA-0346	GULF COAST METHANOL COMPLEX	LA	PSD-LA-820	01/04/2018	wws (Equalization Tanks)	22.2	--	268692	barrels	--	Volatile Organic Compounds (VOC)	A	scrubber	0	--	--	0	--	--
TX-0756	CCI CORPUS CHRISTI CONDENSATE SPLITTER FACILITY	TX	116072 AND PSDTX1388	06/19/2015	Wastewater Treatment Plant	22.2	--	0	--	--	Volatile Organic Compounds (VOC)	B	Overall system to achieve 90% of VOC from treated wastewater. Oil/water separator is enclosed and routed to a carbon adsorption system (CAS). Process drains to be equipped with a water seal. Wastewater sewers will be enclosed. Aerobic digesters will be enclosed and directed to a CAS.	4.56	LB/HR	--	9.04	TPY	--
TX-0861	BUCKEYE TEXAS PROCESSING CORPUS CHRISTI FACILITY	TX	109923, PSDTX1502, AND CIGPSDT	08/29/2019	Wastewater Treatment Plant	22.2	--	0	--	--	Volatile Organic Compounds (VOC)	B	Fixed Roof Wastewater Tank Vapors Route to Non-Regenerative Carbon Adsorption Wastewater Directed to Covered System	100	PPMV	--	0	--	--
LA-0342	SABINE PASS LNG TERMINAL	LA	PSD-LA-703(M6)	09/20/2017	Wastewater tanks	22.9	--	0	--	--	Volatile Organic Compounds (VOC)	A	Closed vent systems and carbon canisters	0	--	--	0	--	--
OK-0156	NORTSTAR AGRICULTURAL IND	OK	2013-0109-C PSD	07/31/2013	Wastewater Evaporator	22.9	--	0	--	--	Volatile Organic Compounds (VOC)	B	Evaporator routed to Mineral Oil Scrubber	0	--	--	0	--	--