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BEFORE THE  
STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES

In the Matter of Establishing                    )  
A Sulfur Dioxide Emission Limitation    ) 86-445038550-J01 ORDER  
for Appleton Papers, Inc.,                    )  
825 East Wisconsin Avenue,                )  
Appleton, WI 54912                            )

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

The Department of Natural Resources, hereinafter DNR, finds that:

1. Appleton Papers, Inc. is located at 825 East Wisconsin Avenue in Appleton, Wisconsin.
2. Appleton Papers, Inc. operates the following direct source(s) capable of emitting sulfur dioxide at this location:  
  
Stack S11, Boiler B22: A 44.0 million BTU per hour steam generating unit, capable of firing solid fossil fuel (coal).
3. Section NR 417.07, Wis. Adm. Code, establishes statewide sulfur dioxide emission limitations in order to ensure that all areas in Wisconsin will attain the National Ambient Air Quality Standards for sulfur dioxide by December 31, 1987.
4. Section NR 417.07(4), Wis. Adm. Code, states that the DNR may require a source to meet a more restrictive emission limitation than the categorical emission limitations which would otherwise be applicable under sec. NR 417.07(2) or (3), Wis. Adm. Code, if the DNR determines that a more restrictive emission limitation is required to ensure that the source will not cause or exacerbate a violation of an ambient air quality standard or air increment for sulfur dioxide.
5. The DNR has determined that a more restrictive emission limitation is required to ensure that Appleton Papers, Inc. will not cause or exacerbate a violation of an ambient air quality standard or air increment for sulfur dioxide.

CONCLUSIONS OF LAW

The DNR concludes that:

1. The DNR has the authority under sec. 144.31(1), Stats., to promulgate rules to establish emission limitations.

2. The operation of direct source(s) of sulfur dioxide by Appleton Papers, Inc. is subject to the limitations contained in sec. NR 417.07, Wis. Adm. Code.
3. The DNR has the authority under sec. NR 417.07(4), Wis. Adm. Code, to establish a more restrictive sulfur dioxide emission limitation than the categorical emission limitations.
4. The DNR has the authority under sec. 144.31(2)(b), Stats., to issue this administrative order.
5. The issuance of this administrative order is reasonable and necessary to accomplish the purposes of secs. 144.30 to 144.426, Stats., and sec. NR 417.07, Wis. Adm. Code.

ORDER

It is therefore ordered that Appleton Papers, Inc. shall meet the following emission limitation(s) by December 31, 1987:

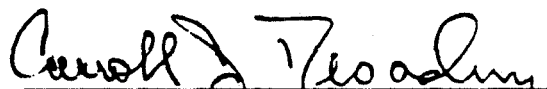
Stack S11, Boiler B22: 4.53 pounds of sulfur dioxide per million BTU heat input to any stack, when firing solid fossil fuel (coal).

NOTICE

This administrative order is effective immediately unless a petition for a contested case hearing for administrative review of this order is filed with the DNR under sec. 144.403, Stats., within 30 days after the date of this order. Any petition for a hearing should name the Wisconsin Department of Natural Resources as respondent. The petition must set forth specifically the issue sought to be reviewed, the interest of the petitioner, the reasons why a hearing is warranted and the relief desired. This notice is provided pursuant to sec. 227.48(2), Stats., (as renumbered by 1985 Wisconsin Act 182).

Dated at Madison, Wisconsin this 27<sup>th</sup> day of October, 1986.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES

  
Carroll D. Besada, Secretary

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10/17/86

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State of Wisconsin / DEPARTMENT OF NATURAL RESOURCES

Lake Michigan District Headquarters  
1125 North Military Avenue  
P.O. Box 10448  
Green Bay, WI 54307-0448

Carroll D. Besadny  
Secretary

October 9, 1986

File Ref: 4530

Mr. Dennis Hultgren  
Appleton Papers, Inc.  
P.O. Box 359  
Appleton, WI 54912

Re: FID #445038550  
Statewide Sulfur Dioxide  
Rule NR 154.12(11), Wisconsin Administrative Code

Dear Mr. Hultgren:

The Department of Natural Resources, Lake Michigan District, Air Management Section, has reviewed the plan filed by your facility to comply with s. NR 154.12(11), Wisconsin Administrative Code, Statewide SO<sub>2</sub> Rule. A provision of the rule authorizes the Department to require a source to meet an emission limitation more restrictive than the categorical limitation if the Department determines that a more restrictive limitation is required to ensure that the source will not violate the sulfur dioxide ambient air quality standards (s. NR 154.12(11)(d), Wisconsin Administrative Code).

The Department has performed sulfur dioxide air quality modeling for your source, assuming emissions at the categorical emission limitation level, based upon parameters you have provided to us. Based upon modeling results, the Department has found that it will be necessary for your source to meet an emission limitation which is more restrictive than the categorical limitation. The more restrictive limitation which your source will be required to meet is outlined below.

Approval of the compliance plan is hereby granted, subject to the following conditions:

1. The sulfur content of the coal must be less than 3.0% by weight. This will keep emissions from your facility's boilers below 4.53 pounds SO<sub>2</sub>/MMBTU.
2. a) Coal sampling shall be performed according to ASTM D2234, Collection of a Gross Sample of Coal.
- b) Preparation of coal sample for analysis shall be performed according to ASTM D2013, Preparing Coal Samples for Analysis.
- c) The sulfur content of a coal shall be determined according to ASTM D3177, Total Sulfur in the Analysis Sample of Coal and

Coke, or ASTM D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods.

- d) The heat content of a coal sample shall be determined according to ASTM D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter.
  - e) The ash content of a coal sample shall be determined according to ASTM D3174, Ash in the Analysis of Coal and Coke.
  - f) The moisture content of a coal sample shall be determined according to ASTM D3173, Moisture in the Analysis Sample of Coal and Coke.
  - g) The ultimate analysis of a coal sample shall be determined according to ASTM D3176, Ultimate Analysis of Coal and Coke.
  - h) The owner or operator of a source shall be required to periodically analyze coal audit samples supplied by the Department.
3. Submit on a quarterly basis, copies of the supplier's analyses for each shipment of coal received for burning at this facility. This analysis shall include:
- i. the total quantity of coal received in each shipment (tons);
  - ii. the weighted average percent of the ash content of coal received in each shipment;
  - iii. the weighted average percent of the sulfur content of the coal received in each shipment;
  - iv. the weighted average heat content expressed in BTU per pound of coal received in each shipment;
  - v. the weighted average sulfur dioxide emission rate in terms of pounds SO<sub>2</sub> per million BTU heat input from the coal received in each shipment.
4. Fuel switching/modification must be completed by October 1, 1986; and certification of final compliance with applicable emission limits must be submitted to the Department of Natural Resources on or before December 31, 1987; in accordance with NR 154.12(11)(f)1.d. and e.
5. Only one boiler may be operated at a time.

Please be advised that under existing rules, ss. NR 154.06(2) and (5), Wisconsin Administrative Code, a source can be requested to perform a stack test to determine whether a violation of emission limitations has occurred, regardless of a source's compliance status as determined by the source's site specific compliance methodology in the approved plan.

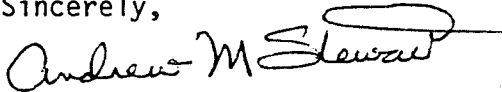
The Department may further modify or rescind this approval because of any future administrative rule changes, failure of your facility to fully comply with the conditions of this approval, or other reasons which justifies modification or rescission of the approval.

NOTICE OF APPEAL RIGHTS

Any person aggrieved by this decision may seek a contested case hearing by serving a petition for hearing, in accordance with the provisions of section 144.403, Stats., on the Secretary of the Department of Natural Resources within 30 days after the date of this decision. This notice is provided pursuant to section 227.48(2)\*, Stats., and should not be construed as an indication that the Department believes that any person has the right to appeal this decision.

Should you have any questions concerning this letter please feel free to contact me at 414-497-4062.

Sincerely,



Andrew M. Stewart  
Air Management Engineer

AMS:cs

cc: Dan Schramm-LMD  
Brian Galley-AM/3

\*This citation has been renumbered as the result of 1985 Wisconsin Act 182, published April 21, 1986.