August 27, 2014

CERTIFIED MAIL NO. 7013 3020 0001 2745 8690
RETURN RECEIPT REQUESTED

PERMITTEE

Packaging Corporation of America (PCA)
15600-A NW 15 Avenue
Miami Gardens, FL 33169

Authorized Representative:
Mr. Bob Farbish, General Manager

Air Permit No. 0251204-009-AC
Permit Expires: August 26, 2015

Packaging Corporation of America
Minor Source Air Construction Permit
Project: Replacement of Folder Gluer

This is the final air construction permit No. 0251204-009-AC, which authorizes the installation of one (1) Ward 50” x 113”, 2 – Color Flexo Folder Gluer to replace the existing Koppers 50” x 113”, 2 – Color Flexo Folder Gluer under Emissions Unit No. 007. The proposed work will be conducted at the Packaging Corporation of America (PCA) Facility. [Standard Industrial Classification (SIC) No. 2653; NAICS 322211]. The facility is located in Miami-Dade County at 15600-A NW 15 Avenue, in Miami Gardens, FL. The Lat./Long. coordinates are 25° 55' 02" N / 80° 13' 30" W.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal.

The notice must be filed within 30 days after this order is filed with the clerk of the Miami-Dade County Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management.

Executed in Miami-Dade County, Florida

_____ _____

H. Patrick Wong, Chief (Date)
Air Quality Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by certified U.S. mail and/or electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Bob Farbish, General Manager, Packaging Corporation of America, 15600-A NW 15 Avenue, Miami Gardens, FL 33169
[bfarbish@packagingcorp.com]

Dale Francke, P.E., Environment, Health & Safety Partners, LLC., 500 SW North Carolina Dr., Stuart, FL 34994
[DFRANCKEPE@GMAIL.COM]

Diane Pupa, Florida Department of Environmental Protection, Southeast District Office
[Diane.Pupa@dep.state.fl.us]

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____

(Clerk) (Date

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The Packaging Corporation of America (PCA) facility purchases corrugated sheets and converts them into shipping containers or cardboard boxes. The corrugated sheets are fabricated to customer specifications using a particular combination of scoring, slotting, printing, and gluing. The exact combination of steps depends on the customer requirements. The corrugated sheets are initially cut, slotted, and folded. These activities generate scrap-corrugated material in the form of pieces and paper dust, which is collected by the cyclone scrap handling system. The corrugated sheets are then printed and adhesives are applied to fabricate the finished product. Volatile organic compounds (VOCs), and hazardous air pollutants (HAPs) are emitted from the printing, and gluing operations and particulate matter (PM) is emitted from the scrap paper collection.

The existing facility consists of the following emissions unit(s).

Facility ID No. 0251204

ID No.	Emission Unit Description
001	Ward 66” 2 – Color Die Cutter
002	Marumatsu 86” 1 – Color Flexo Printer Slotter
003	Koppers 35” 2 – Color Flexo Folder Gluer
004	Paper Scrap Collection – Paper Scrap Collection-Airscreen separator and a Farr APC Model No. GS48 filter cartridge dust collector
005	Serenco 66” 2 – Color Die Cutter
006	Martin Mini 24” 3 – Color Flexo Folder Gluer
007	Koppers 50” 2 – Color Flexo Folder Gluer
008	Pot Devon – Label Gluer
009	Jagenberg Diana 165-2 – Folder Gluer

Proposed Project

The applicant requests an air construction permit for the installation of one (1) replacement folder gluer.

This project will add the following emissions unit.

Facility ID No. 0251204

ID No.	Emission Unit Description
010	Ward 50” 2 – Color Flexo Folder Gluer

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a Synthetic minor, Non-Title V source of air pollution.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Miami-Dade County Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management. The RER's mailing address is: 701 NW 1 Court, Suite 400, Miami, Florida 33136. The RER's telephone number is 305/372-6925. All documents related to applications for permits to operate an emissions unit shall be submitted to the RER, Division of Environmental Resources Management, Air Quality Management.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the RER, Division of Environmental Resources Management, Air Quality Management. The mailing address of the RER, Division of Environmental Resources Management, Air Quality Management is: 701 NW 1 Court, Suite 400, Miami, Florida 33136. The RER, Division of Environmental Resources Management, Air Quality Management's telephone number is 305/372-6925.

3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions.
   d. Appendix D. Common testing requirements. (If applicable)

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C, and Chapter 24, Code of Miami-Dade County. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the RER or Florida Department of Environmental Protection (FDEP) may require the permittee to conform to new or additional conditions. The RER or FDEP shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the RER or FDEP may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the RER upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the RER. Such permit shall be obtained prior to beginning construction or modification.
   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:
   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

(b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Application for Air Operation Permit: This permit authorizes construction and/or installation of the permitted emission unit(s) and initial operation to determine compliance with the FDEP and the RER rules. **An operation permit is required for regular operation of the permitted emission units.** The owner or operator shall apply for and receive an operation permit prior to expiration of this permit. An application for an operation permit shall be submitted to the Miami-Dade County Department of Regulatory and Economic Resources, Division of Environmental Resources Management, Air Quality Management. To apply for an operation permit, the applicant shall submit the appropriate application fee and, in triplicate, the appropriate application form, a certification that construction was completed with a notation of any deviations from the conditions on the construction permit, compliance test results, and such additional information as the RER may by law require.
[Rule 62-4.030, 62-4.050, 62-4.220, and 62-210.300 F.A.C.]

9. Extension of This Permit: The expiration date of this construction permit may be extended upon request of the owner or operator and submission of the appropriate fee to the Miami-Dade County Department of Regulatory and Economic Resources, Division of Environmental Resources Management, Air Quality Management **at least 60 days prior** to the expiration date of this permit.
[Rule 62-4.030, 62-4.050, 62-4.070(3), and 62-4.220 F.A.C.]

10. Annual Operating Report Required: The Annual Operating Report (DEP Form No. 62-210.900(5)) shall be completed each year and submitted to the Miami Dade County, RER, Air Quality Management or submitted electronically to the FDEP by April 1 of the following year.
[Rule 62-210.370(3) F.A.C.]

11. Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous wastes in accordance with all applicable Federal, State and Local regulations.

This section of the permit addresses the following emissions unit(s).

ID No.	Emission Unit Description
001	Ward 66” 2 – Color Die Cutter
002	Marumatsu 86” 1 – Color Flexo Printer Slotter
003	Koppers 35” 2 – Color Flexo Folder Gluer
004	Paper Scrap Collection – Paper Scrap Collection-Airscreen separator and a Farr APC Model No. GS48 filter cartridge dust collector
005	Serenco 66” 2 – Color Die Cutter
006	Martin Mini 24” 3 – Color Flexo Folder Gluer
007	Koppers 50” 2 – Color Flexo Folder Gluer
008	Pot Devon – Label Gluer
009	Jagenberg Diana 165-2 – Folder Gluer
010	Ward 50” 2 – Color Flexo Folder Gluer (New)

1. **This permit supersedes previously issued Air Construction Permit Nos. 0251204-001, 005 & 006-AC**.

EQUIPMENT

2. Equipment Name: The permittee is authorized to install the following equipment: One (1) Ward 50” 2-Color Flexo Folder Gluer.
   [Application No. 0251204-009-AC]

PERFORMANCE RESTRICTIONS AND EMISSIONS STANDARDS

3. Visible emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the visible emissions of which is equal to, or greater than 20% opacity.
   [Rule 62-296.320(4)(b), F.A.C.]

4. Facility Wide VOC Emissions: Emissions of volatile organic compounds (VOCs), including hazardous air pollutants (HAPs), shall not equal or exceed 95 tons in any consecutive 12-month period.
   [Rule 62-4.070(3), F.A.C.]

5. Facility Wide HAP Emissions: Total emissions of all hazardous air pollutants (HAPs) shall not equal or exceed 24.5 tons in any consecutive 12-month period.
   [Rule 62-4.070(3), F.A.C.]

6. Facility Wide Individual HAP Emissions: Emissions of any individual hazardous air pollutant (HAP) other than styrene shall not equal or exceed 9.5 tons in any consecutive 12-month period.
   [Rule 62-4.070(3), F.A.C.]

7. Facility Wide Particulate Matter (PM) Emissions: Total emissions of all Particulate Matter (PM) shall not equal or exceed 100 tons in any consecutive 12-month period.
   [Rule 62-4.070(3), F.A.C.]

8. Ink Usage Limit: Total amount of ink usage for the facility shall not exceed 175 tons in any consecutive 12-month period.
   [Rule 62-4.070(3), F.A.C.]

9. Glue Usage Limit: Total amount of glue usage for the facility shall not exceed 130 tons in any consecutive 12-month period.
   [Rule 62-4.070(3), F.A.C.]

10. VOC Content Limit for Glues: No glues with a VOC concentration greater than 5.33% shall be used at the facility.
    [Rule 62-4.070(3), F.A.C.]

11. VOC Content Limit for Inks: No inks with a VOC concentration greater than 3.29% shall be used at the facility.
    [Rule 62-4.070(3), F.A.C.]

12. HAP Content Limit for Glues: No glues with a total HAP concentration greater than 4.84% shall be used at the facility.
    [Rule 62-4.070(3), F.A.C.]

13. HAP Content Limit for Inks: No inks with a total HAP concentration greater than 3.29% shall be used at the facility.
    [Rule 62-4.070(3), F.A.C.]

14. Glycol Ethers Content Limit for Glues: No glues with a Glycol Ethers concentration greater than 4.64% shall be used at the facility.
    [Rule 62-4.070(3), F.A.C.]

15. Glycol Ethers Content Limit for Inks: No inks with a Glycol Ethers concentration greater than 1.80% shall be used at the facility.
    [Rule 62-4.070(3), F.A.C.]

16. Hours of Operation: The referenced emissions unit(s) may operate 24 hours/day, 7 days/week for 52 weeks/year resulting in a total of 8,760 hours/year.
    [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

COMPLIANCE MONITORING, REPORTING AND RECORDKEEPING REQUIREMENTS

17. VOC Content and Emissions: The owner or operator shall determine the VOC content of all materials, including solvents, and shall monitor the usage of such materials at the referenced emission unit(s), by recording and maintaining the following information:
    a. The VOC content for each material containing or emitting VOCs.
    b. The material utilization rate on a monthly basis, for all materials containing or emitting VOCs used at the referenced emission unit(s).
    c. The total monthly VOC emission rates for each material, calculated from the monthly material utilization rates and the VOC content, calculated for the preceding month no later than 10 days after the end of that month.

d. A rolling consecutive 12-month total emission rate for VOCs, calculated from the monthly totals for the previous twelve calendar months.

[Rule 62-4.070(3), F.A.C.]

18. Individual & Total HAP Content and Emissions: The owner or operator shall determine the total and individual HAP contents of all materials, including solvents, and shall monitor the usage of such materials at the referenced emission unit(s), by recording and maintaining the following information:
    a. The individual and total HAP contents for each material containing or emitting HAPs.
    b. The material utilization rate on a monthly basis, for all materials containing or emitting HAPs used at the referenced emission unit(s).
    c. The individual and total monthly HAP emission rates for each material, calculated from the monthly material utilization rates and the individual and total HAP content, calculated for the preceding month no later than 10 days after the end of that month.
    d. A rolling consecutive 12-month total emission rate for individual and total HAPs, calculated from the monthly totals for the previous twelve calendar months.

    [Rule 62-4.070(3), F.A.C.]

19. Ink & Glue Usage Records: The owner or operator shall maintain records to document the monthly and 12 month rolling totals of tons of glue and ink used at the facility.
    [Rule 62-4.070(3), F.A.C.]

20. Record keeping and recycling: The permittee shall maintain a log of the amount of chemicals manifested to recyclers, the manufacturer, or the dump.
    [Rule 62-4.070(3), F.A.C.]

21. Supporting Documentation: The permittee shall maintain supporting documentation, such as Material Safety Data Sheets, purchase orders, usage and disposal records, etc., and shall include sufficient information to determine compliance. The log and documents shall be kept at the facility and made available for RER inspection for a minimum of three (3) years from the date of such records. Monthly logs shall be completed within 10 calendar days after completion of the preceding month.
    [Rule 62-4.070(3), F.A.C.]

22. Control Equipment: The permittee shall visually inspect Emissions Unit 004 and associated dust collector daily to ensure that each dust collector is operating properly, and shall record the condition of each dust collector and pressure drop reading when inspected. The permittee shall perform a detailed inspection of each dust collector at least monthly and record the inspection results. Such inspections shall include general conditions of the emissions control equipment, condition of the filter cartridges and appurtenances, and verification of proper operation of the filter cartridge cleaning cycle if applicable.
    [Rule 62-4.070(3), F.A.C.]