TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

International Paper Company, Plant City Facility

Hillsborough County

Construction Permit

Application Number

0571029-022-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

January 7, 2015

I. Project Description

A. Applicant:

Mark Bullard
General Manager
International Paper Company, Plant City Facility
2402 Police Center Drive
Plant City, FL 33566

B. Engineer:

Lynn Robinson
P.E. No.: 20786
Southern Environmental Sciences, Inc.
1204 North Wheeler Street
Plant City, FL 33563

C. Project and Location:

This permit authorizes an increase in the grain loading limit of the scrap collection system baghouse and an increase in the ink usage limit at International Paper Company, Plant City Facility, a corrugated box product manufacturing facility.

The project has been assigned NEDS Source Classification Code No. 3-07-013-99 (Industrial Processes, Pulp and Paper and Wood Products, Miscellaneous Paper Products). The Standard Industrial Code for the project is No. 2653 for Corrugated and Solid Fiber Boxes. The project is located at 2402 Police Center Drive, Plant City, Hillsborough County, FL 33566. UTM Coordinates of the location are 17-391.21 East and 17-3095.89 North.

D. Process and Controls:

This permit authorizes an increase in the grain loading limit of the scrap collection system baghouse and an increase in the ink usage limit at International Paper Company, Plant City Facility, a corrugated box product manufacturing facility. The facility's operation consists of the corrugation of paper medium and the assembly of corrugated boards. Once assembled, the corrugated board is then cut, scored, printed, and folded into customer-specific box sizes.

The manufacturing process consists of continuously gluing a fluted paper medium between two layers of paper liner to create the corrugated board. The facility operates one corrugating machine. The corrugated board is fully constructed during a single inclusive operation. A preheated and moistened paper medium passes through a flute former and an adhesive is applied to the fluted tips on one surface of the fluted paper. The fluted surface is immediately brought into contact with a liner sheet to produce a single-face sheet. The single-face web is then brought into contact with a second glue roller and combined with a second liner sheet to form a double-face sheet of corrugated board.

The sheet then travels through a series of hot plates, heated with steam from the 21 MMBtu/hr, natural gas or LPG fired, York Shipley boiler, Model No. 588SPH500NP, to ensure that the layers of paper adhere to each other. The edge of the sheet is trimmed and the trim is sent to the scrap collection system. The sheet is scored or slit as needed and sent to a rotary knife which cuts the sheet into the desired size. The sheets are then stacked and transported to the finishing area.

In the Finishing Area, the corrugated boxes are printed and cut to size as needed using four rotary die cutters/printers: a Ward 66" Two-Color Rotary Die Cutter; a Ward 66" Three-Color Rotary Die Cutter; a Ward 66" Four-Color Rotary Die Cutter; and a Ward 37 ½ inch Three-color Flexo Folder Gluer Printer. The Die Cutters are capable of printing on the corrugated sheets. The Folder Gluer Printer is capable of printing, folding, and gluing the corrugated sheets.

The scrap generated by the cutting of the corrugated sheet falls onto small conveyor belts and is transported to the Pneumatic Scrap Collection System where the scrap is baled for recycling. If large pieces of scrap need to be shredded prior to baling, a shredder is used to shred the scrap. The shredder is located indoors and is vented to the scrap collection system control device. The Pneumatic Scrap Collection System is controlled by a 35,400 ACFM Aircon, Model No. 16RA432-10, baghouse.

This permit authorizes an increase in the grain loading limit of the baghouse. The grain loading limit of the baghouse will increase from 0.01 gr/dscf to 0.03 gr/dscf. This results in an increase in PM emissions from 13.3 tons/year to 39.3 tons/year for EU No. 004. The facility wide PM emissions will increase from 14.6 tons/year to 41.2 tons/year. In addition, because a well-maintained baghouse is expected to be able to meet a grain loading limit of 0.03 gr/dscf, this permit removes the requirement to perform a PM stack test on the baghouse.

This permit also authorizes an increase in the ink throughput limit. The ink usage limit will increase from 300,000 lbs/year to 500,000 lbs/year. This results in an increase in VOC emissions from 18.8 tons/year to 25.6 tons/year for EU No. 003. The facility wide VOC emissions will increase from 19.3 tons/year to 26.1 tons/year.

This project results in the facility becoming subject to Rules 62-296.700 - Reasonably Available Control Technology (RACT) Particulate Matter and 62-296.712, F.A.C. - Miscellaneous Manufacturing Process Operations. In accordance with Rule 62-296.700(6), F.A.C., an Operation and Maintenance Plan will be included in the operating permit for EU No. 004.

The wide-web printing presses are subject to 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry. Because the facility is an area source of HAPs, the facility is subject only to the provisions of 40 CFR 63.829, Recordkeeping Requirements, and 40 CFR 63.830, Reporting Requirements.

E. Application Information:

Application Received:	December 5, 2014
Information Requested:	NA
Application Complete:	December 5, 2014

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is subject to the requirements of Rule 62-212.300, General Preconstruction Review Requirements, F.A.C., since the project is not exempt from the permit requirements in Rule 62-210.300, F.A.C.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, Preconstruction Review for Nonattainment Areas, F.A.C., since the facility is a Synthetic Non-Title V source by state definition.

This project is not subject to the requirements of Rule 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C., since the facility is a Synthetic Non-Title V source by state definition.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the facility is a source of particulate matter and volatile organic compound emissions and a potential source of odors.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.470, Specific Emission Limiting and Performance Standards, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.500, Volatile Organic Compounds and Nitrogen Oxides Reasonably Available Control Technology, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.600, Lead Reasonably Available Control Technology, F.A.C., since there is no applicable source specific category in this rule.

This project is subject to the requirements of Rule 62-296.700, Particulate Matter Reasonably Available Control Technology, F.A.C., since there is an applicable source specific category in this rule, specifically, Rule 62-296.712, F.A.C. - Miscellaneous Manufacturing Process Operations.

This project is subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C. since there an applicable source specific category in this rule. The wide-web printing presses are subject to 40 CFR 63, Subpart KK, NESHAP for Printing and Publishing Industry. Because the facility is an area source of HAPs, the facility is subject only to the provisions of 40 CFR 63.829, Recordkeeping Requirements, and 40 CFR 63.830, Reporting Requirements.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

III. Summary of Emissions

A) VOC Emissions:

Emission Unit (EU) No.	EU Description	Potential VOC Emissions (tons/yr)	Actual VOC Emissions (tons/yr)	Increase in VOC Emissions (tons/yr)	Allowable
003	Corrugation and Finishing	25.6	8.0	17.6	NA
	Total	25.6	8.0	17.6	--

B) PM Emissions:

Emission Unit (EU) No.	EU Description	Potential PM Emissions (tons/yr)	Actual PM Emissions (tons/yr)	Increase in PM Emissions (tons/yr)	Allowable
004	Scrap Collection System with Baghouse	39.9	5.7	34.2	0.03 gr/dscf and 5% opacity
	Total	39.9	5.7	34.2	--

- Actual Emissions are based on the average of 2012 and 2013 AOR data.
- Potential VOC emissions for EU No. 003 are based on a throughput limitation and an annual average VOC content for each type of material.
- Potential PM emissions for EU No. 004 are based on a grain loading limit of 0.03 gr/dscf, an airflow rate of 35,400 DSCFM for the baghouse, and 8,760 hours/year of operation.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft

permit and its conditions as stipulated (see attached).

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

Mr. Mark Bullard
General Manager
International Paper Company
2402 Police Center Drive
Plant City, FL 33566

File No.: 0571029-022-AC
County: Hillsborough

INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, International Paper Company, Plant City Facility, applied on December 5, 2014 to the EPC for a construction permit to increase the potential emissions for the scrap collection system and to increase the ink usage limit. The facility, which is a Synthetic Non-Title V Source, is located at 2402 Police Center Drive, Plant City, Florida.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility.

The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4.

Pursuant to Section 403.815 and 403.0872, F.S. and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the

county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Drive, Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S.; or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;

(b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;

(c) A statement of how and when the petitioner received notice of the EPC action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner,
(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,
(c) Each rule or portion of a rule from which a variance or waiver is requested,
(d) The citation to the statute underlying (implemented by) the rule identified in (c) above,
(e) The type of action requested,
(f) The specific facts that would justify a variance or waiver for the petitioner,
(g) The reason by the variance or waiver would serve the purposes of the underlying statute (implemented by the rule), and
(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of the those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director

cc: Florida Department of Environmental Protection (posting online)
Lynn Robinson, P.E. - Southern Environmental Sciences, Inc. (via email)

CERTIFICATE OF SERVICE

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed before the close of business on _____ to the listed persons.

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

_____ _____
Clerk Date

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
NOTICE OF INTENT TO ISSUE PERMIT

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue an Air Pollution Permit 0571029-022-AC to International Paper Company, Plant City Facility to increase the potential emissions for the scrap collection system and to increase the ink usage limit at the corrugated box manufacturing facility. The facility, a Synthetic Minor Source, is located at 2402 Police Center Drive, Plant City, FL 33566.

A Best Available Control Technology (BACT) determination was not required.

The EPC will issue the Final permit with the conditions of the DRAFT permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;

(b) The name, address, and telephone number of the petitioner, and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when petitioner received notice of the EPC action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner

contends warrant reversal or modification of the EPC proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition this order will not be effective until further order of the EPC.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and 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 thirty days after this order is filed with the clerk of the Department.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Drive, Tampa, Florida 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permit and require, if applicable, another Public Notice.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mr. Mark Bullard
General Manager
International Paper Company
2402 Police Center Drive
Plant City, FL 33566

Dear Mr. Bullard:

Enclosed is Permit Number 0571029-022-AC to increase the potential emissions for the scrap collection system and to increase the ink usage limit at the corrugated box manufacturing facility, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 1900 9th Avenue, Tampa, FL 33605; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

cc: Florida Department of Environmental Protection (posting online)
Lynn Robinson, P.E. - Southern Environmental Sciences, Inc. (via email)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

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

_____ _____
Clerk Date

PERMITTEE:
International Paper Company
Plant City Facility
2402 Police Center Drive
Plant City, FL 33566

PERMIT/CERTIFICATION
Permit No.: 0571029-022-AC
County: Hillsborough
Expiration Date: June 7, 2015
Project: Increase PM PTE for the Scrap Collection System Baghouse and Increase Ink Usage

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the EPC and made a part of hereof and specifically described as follows:

This permit authorizes an increase in the grain loading limit of the scrap collection system baghouse and an increase in the ink usage limit at International Paper Company, Plant City Facility, a corrugated box product manufacturing facility. The facility's operation consists of the corrugation of paper medium and the assembly of corrugated boards. Once assembled, the corrugated board is then cut, scored, printed, and folded into customer-specific box sizes. The following is a detailed description of this process.

The manufacturing process consists of continuously gluing a fluted paper medium between two layers of paper liner to create the corrugated board. The facility operates one corrugating machine. The corrugated board is fully constructed during a single inclusive operation. A preheated and moistened paper medium passes through a flute former and an adhesive is applied to the fluted tips on one surface of the fluted paper. The fluted surface is immediately brought into contact with a liner sheet to produce a single-face sheet. The single-face web is then brought into contact with a second glue roller and combined with a second liner sheet to form a double-face sheet of corrugated board.

The sheet then travels through a series of hot plates, heated with steam from the 21 MMBtu/hr, natural gas or LPG fired, York Shipley boiler, Model No. 588SPH500NP, to ensure that the layers of paper adhere to each other. The edge of the sheet is then trimmed and the trim is sent to the scrap collection system. The sheet is scored or slit as needed and sent to a rotary knife which cuts the sheet into the desired size.

Once the board is formed, the boards are transported to the finishing area. In the Finishing Area, the

corrugated boards are printed and cut to size as needed using four rotary die cutters/printers: a Ward 66" Two-Color Rotary Die Cutter; a Ward 66" Three-Color Rotary Die Cutter; a Ward 66" Four-Color Rotary Die Cutter; and a Ward 37 ½ inch Three-color Flexo Folder Gluer Printer. The Die Cutters are capable of printing on the corrugated boards. The Folder Gluer Printer is capable of printing, folding, and gluing the corrugated boards.

The scrap generated by the cutting of the corrugated board falls onto small conveyor belts and is transported to the Pneumatic Scrap Collection System where the scrap is baled for recycling. If large pieces of scrap need to be shredded prior to baling, a shredder is used to shred the scrap. The shredder is located indoors and is vented to the scrap collection system control device. The Pneumatic Scrap Collection System is controlled by a 35,400 ACFM Aircon, Model No. 16RA432-10, baghouse.

The wide-web printing presses are subject to 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry. Because the facility is an area source of HAPs, the facility is subject only to the provisions of 40 CFR 63.829, Recordkeeping Requirements, and 40 CFR 63.830, Reporting Requirements. Based on the increase in ink usage, the facility-wide VOC emissions will increase to 26.1 tons/year.

Location: 2402 Police Center Drive, Plant City, FL 33566

UTM: 17-391.21E 3095.89N

NEDS NO: 0571029

Emission Unit No.: 003 – Corrugation and Finishing
004 – Scrap Collection System with Baghouse

References Permit No.: 0571029-020-AC

Replaces Permit No.: NA

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

4. As requested by the permittee, in order to limit the potential to emit and in order to establish the facility as a synthetic minor facility for both criteria and Hazardous Air Pollutants (HAP), the following potential and allowable emission limitations shall apply per twelve consecutive month period: [Rule 62-4.070(3), F.A.C. and Permit Application Received December 5, 2014]

A)

EU No.	Potential PM (Tons/Year)	Allowable (grains/dscf)	Flow Rate (acfm)
004 - Scrap Collection System with Baghouse	39.9	0.03	35,400

B) The facility-wide PM potential emissions shall not exceed 41.2 TPY.
C) The Hazardous Air Pollutant (HAP), as defined in Rule 62-210.200 F.A.C., emissions shall be less than 10 tons in any twelve consecutive month period for any individual HAP and less than 25 tons in any 12 consecutive month period for any combination of HAPs.

5. Visible emissions from the scrap collection system (EU 004) shall not exceed 5% opacity. [Rule 62-296.712(2), F.A.C. and Chapter 1-3.52.2 of the Rules of the EPCHC]

6. Each emissions unit is authorized to operate 8,760 hours per 12 consecutive month period. [Rule 62-4.070(3), F.A.C. and Permit Application Received December 5, 2014]

7. In order to ensure compliance with the emission limitations of Specific Condition Nos. 4, 5 and 6, the following restrictions and limitations shall apply: [Rule 62-4.070(3), F.A.C. and Permit Application Received December 5, 2014]

A) Only cardboard/paper scrap shall be handled in the scrap collection system.
B) Particulate matter emissions generated from the scrap collection system operations shall be vented to the baghouse.
C) The maximum material usages and the maximum annual average VOC content (%) for the corrugation and finishing operations (EU No. 003) shall not exceed the following per twelve

SPECIFIC CONDITIONS:

consecutive month period:

Material Type	Material Usage (pounds)	Average % VOC by weight
Resin	135,000	0.5
Glue	175,000	4.6
Solvent Cleaner	3,360	100
Ink	500,000	6.8
PH Adjuster III	20,558	15
Propylene Glycol	2,100	100
Flexo Deformer II	360	0.5

8. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

9. Test the scrap collection system baghouse (EU 004) for visible emissions annually, once per federal fiscal year (October 1 – September 30), with a target date of May 21. The EPA Method 9 test observation period for the baghouse shall be at least thirty (30) minutes. Two copies of the test data shall be submitted to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of testing. Testing procedures shall be consistent with the requirements of 40 CFR 60 and Rule 62-297, F.A.C. [Rules 62-297.310(4)(a), 62-297.310(7)(a), and 62-4.070(3), F.A.C.]

10. Compliance with the emission limitations of Specific Condition Nos. 4, 5, and 7 shall be determined using EPA Methods 1, 2, 4, 5, 9 and 24 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-4.070(3) and 62-297.310, F.A.C.]

11. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity of the rates specified in Specific Condition No. 7. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

12. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C]

13. The emissions control equipment shall be maintained in good repair to perform adequately the

function for which it was intended. Any maintenance/repair performed should be recorded. Records shall be maintained for the most recent three year period and made available for inspection upon request. [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C. and Permit No. 0571029-020-AC]

14. The permittee shall not circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C. and Permit No. 0571029-020-AC]

15. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

16. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320(1), F.A.C.]

A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
C) Immediately attend to all spills/waste as appropriate.

17. The permittee shall submit initial notifications as follows and as required in 40 CFR 63.9(b) to the Environmental Protection Commission of Hillsborough County for the flexographic printers. [40 CFR 63.830(b)(1)]

A) Initial notifications for new and reconstructed sources shall be submitted as required by 40 CFR 63.9(b). The requirements of 40 CFR 63.9(b) are specified in Appendix A, which is attached to this permit.
B) For the purpose of 40 CFR 63, Subpart KK, a Title V or part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b), provided the same information is contained in the permit application as required by 40 CFR 63.9(b) and the application is submitted to the EPC. [40 CFR 63.830(b)(1)(iii)]
C) Permit applications shall be submitted by the same due dates as those specified for the initial notification as required by 40 CFR 63.9(b)(2). [40 CFR 63.830(b)(1)(iv)]

SPECIFIC CONDITIONS:

18. In order to demonstrate compliance with Specific Condition Nos. 4, 8, and 17, the permittee shall maintain monthly records of operations for the most recent three year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, State, or Federal air pollution agency upon request. The records shall include, but are not limited to, the following: [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C., 40 CFR 63.829(d) and Permit No. 0571029-020-AC]

A) Day, Month, Year
B) Material usage for each type of material (i.e., resin, glue, cleaner, ink and additives)
C) VOC and HAP content for each material used
D) HAP emissions (tons)
E) Monthly summary of B) through D) above
F) Rolling Twelve Month Total of B) through D) above

19. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3), F.A.C.]

20. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(185), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment.
B) Installation or addition of any equipment which is a source of air pollution.

21. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director

APPENDIX A – 40 CFR 63.9(b)

Facility: International Paper Company
Facility No: 0571029

Initial notifications. [40 CFR 63.9(b)]

(1)(i) The requirements of this paragraph apply to the owner or operator of an affected source when such source becomes subject to a relevant standard.

(ii) If an area source that otherwise would be subject to an emission standard or other requirement established under this part if it were a major source subsequently increases its emissions of hazardous air pollutants (or its potential to emit hazardous air pollutants) such that the source is a major source that is subject to the emission standard or other requirement, such source shall be subject to the notification requirements of this section.

(iii) Affected sources that are required under this paragraph to submit an initial notification may use the application for approval of construction or reconstruction under Sec. 63.5(d) of this subpart, if relevant, to fulfill the initial notification requirements of this paragraph.

(2) The owner or operator of an affected source that has an initial startup before the effective date of a relevant standard under this part shall notify the Administrator in writing that the source is subject to the relevant standard. The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information:

(i) The name and address of the owner or operator;

(ii) The address (i.e., physical location) of the affected source;

(iii) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;

(iv) A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and

(v) A statement of whether the affected source is a major source or an area source.

(3) [Reserved]

(4) The owner or operator of a new or reconstructed major affected source for which an application for approval of construction or reconstruction is required under Sec. 63.5(d) must provide the following information in writing to the Administrator:

(i) A notification of intention to construct a new major-emitting affected source, reconstruct a major-emitting affected source, or reconstruct a major source such that the source becomes a major-emitting affected source with the application for approval of construction or reconstruction as specified in Sec. 63.5(d)(1)(i); and

(ii)-(iv) [Reserved]

(v) A notification of the actual date of startup of the source, delivered or postmarked within 15 calendar days after that date.

(5) The owner or operator of a new or reconstructed affected source for which an application for approval of construction or reconstruction is not required under Sec. 63.5(d) must provide the following information in writing to the Administrator:

(i) A notification of intention to construct a new affected source, reconstruct an affected source, or reconstruct a source such that the source becomes an affected source, and

(ii) A notification of the actual date of startup of the source, delivered or postmarked within 15 calendar days after that date.

(iii) Unless the owner or operator has requested and received prior permission from the Administrator to submit less than the information in Sec. 63.5(d), the notification must include the information required on the application for approval of construction or reconstruction as specified in Sec. 63.5(d)(1)(i).