ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

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

File No.: 0571029-023-AO
County: Hillsborough

Enclosed is Permit Number 0571029-023-AO to operate a corrugated box manufacturing facility, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

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 Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2660. 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 receipt of this permit. 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 thepetition 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 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.

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. 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 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 Dr., 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

RDG/LAW/law

Attachment

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

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE 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 clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

PERMITTEE:	PERMIT/CERTIFICATION
International Paper Company	Permit No.: 0571029-023-AO
Plant City Facility	County: Hillsborough
2402 Police Center Drive	Expiration Date: February 17, 2021
Plant City, FL 33566	Project: Corrugated Box Manufacturing

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 the operation of 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 board 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 board is trimmed and the trim is sent to the scrap collection system described below. The board is scored or slit as needed and sent to a rotary knife which cuts the board into the desired size.

The adhesive used to join the three layers of paper is made from a mixture of starch and additives. The starch is pneumatically unloaded from railcars into a storage silo equipped with a 550 ACFM Day Donaldson, Model No. 25PJD8, baghouse. From the silo, the starch is pneumatically pumped to the starch kitchen, where the starch is mixed with resin and other additives that affect the overall properties of the corrugated product. The York Shipley boiler described above is used to heat the starch solution. The adhesive is then pumped to the glue rolls on the corrugator.

Once the board is formed on the corrugator, 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. A wax coating can be applied to the finished corrugated boxes as needed. The boxes that are waxed are primarily used by agricultural customers. The wax is kept in a liquid state by the steam provided by the boiler.

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. International Paper is also subject to Rule 62-296.700 - Reasonably Available Control Technology (RACT) Particulate Matter; and Rule 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 is included in the permit for the Scrap Collection System (EU 004). In addition, the boiler is subject Rule 62-296.406 - Fossil Fuel Steam Generators with Less Than 250 Million Btu Per Hour Heat Input, New and Existing Emissions Units.

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

UTM: 17-391.21E 3095.89N

NEDS NO: 0571029

Emission Unit ID: 001 – Starch Silo with Baghouse
002 – York Shipley Boiler
003 – Corrugation and Finishing
004 – Scrap Collection System with Baghouse

References Permit Nos.: 0571029-020-AC and 0571029-022-AC

Replaces Permit No.: 0571029-021-AO

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 Nos. 0571029-020-AC and 0571029-022-AC]

A)

Source	Potential PM (Tons/Year)	Allowable (grains/dscf)	Flow Rate (acfm)
EU 001 - Starch Silo with Baghouse	0.6	0.03	550
EU 004 - Scrap Collection System with Baghouse	39.9	0.03	35,400

B) The facility-wide PM potential emissions shall not exceed 41.2TPY.
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 silo (EU 001) and the scrap collection system operation (EU 004) shall not exceed 5% opacity. [Rule 62-296.712(2), F.A.C., Chapter 1-3.52.2 of the Rules of the EPCHC, and Permit No. 0571029-022-AC]

6. Visible emissions from the boiler (EU 002) shall not exceed a density of 20% opacity except for one six-minute period per hour in which opacity shall not exceed 27%. [Rule 62-296.406(1), F.A.C. and Permit No. 0571029-020-AC]

7. 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 No. 0571029-020-AC]

8. 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 Nos. 0571029-

SPECIFIC CONDITIONS:

020-AC and 0571029-022-AC]

A) Only starch shall be handled in the starch storage silo.
B) Only cardboard/paper scrap shall be handled in the scrap collection system.
B) The maximum filling rate for the starch storage silo shall not exceed 30 tons per hour.
C) The maximum starch throughput shall not exceed 5,000 tons per twelve consecutive month period.
D) Particulate matter emissions generated from the silo and scrap collection system operations shall be vented to the corresponding baghouse.
G) When loading the starch storage silo, the loading line pressure shall not exceed 12 psi in order to prevent rupture of the bags in the baghouse.
H) The boiler shall be fired only on natural gas with liquid propane gas (LPG) as a back-up at a maximum heat input rate of 21 MMBTU/hr.
I) The maximum material usages and maximum average VOC content (%) for the corrugation and finishing operations shall not exceed the following per twelve 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

9. 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.]

10. Test the starch silo baghouse (EU 001), the boiler exhaust (EU 002), and 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 each baghouse shall be at least thirty (30) minutes. The EPA Method 9 test observation period for the boiler shall be sixty (60) 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.]

11. Compliance with the emission limitations of Specific Condition Nos. 4, 5, and 6 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.

SPECIFIC CONDITIONS:

[Rules 62-4.070(3) and 62-297.310, F.A.C.]

12. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity of the material handling and heat input rates specified in Specific Condition No. 8. For the scrap collection system (EU 004), capacity is defined as actively transferring scrap material to the scrap collection system. 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 throughput and heat input rates and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

13. 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]

14. For the starch silo (EU 002), the emissions control equipment shall be maintained in good repair to perform adequately the function for which it was intended. Maintenance shall include, but is not limited to, monthly inspections and replacement or repair of faulty equipment when necessary. 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]

15. For the scrap collection system operation (EU 004), the permittee shall maintain compliance with the requirements of the attached Operation and Maintenance Plan (Appendix B). [Rules 62-296.700(6) and 62-4.070(3), F.A.C.]

16. 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]

17. 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.]

18. 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

SPECIFIC CONDITIONS:

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.

19. 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)]

20. In order to demonstrate compliance with Specific Condition Nos. 4, 8, and 19, 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. and Permit No. 0571029-022-AC]

A) Day, Month, Year
B) Material usage for each type of material (i.e., starch, resin, glue, cleaner, ink, and additives)
C) VOC and HAP content for each material used
D) HAP emissions (tons)
E) Amount of paper used in the corrugators (square feet)
F) Amount of scrap material baled (tons)
G) Hours of operation of the starch silo (EU 001)
H) Hours of operation of the scrap collection system (EU 004)
I) Monthly summary of B) through H) above
J) Rolling Twelve Month Total of B) through H) above

21. 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

SPECIFIC CONDITIONS:

Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3), F.A.C.]

22. 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, 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.

23. 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.]

24. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form along with the proper fee. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director