

August 13, 2013

CERTIFIED MAIL:

Mr. Mark Bullard,
Florida Complex General Manager
International Paper Orlando Container Plant
711 East Lancaster Road
Orlando, FL 32809

Subject: Project Number 0951333-004
International Paper
Minor Source Air Construction Permit
Project Name: Add Fourth Press

Dear Mr. Bullard:

On July 15, 2013, you submitted an application to authorize construction of a fourth flexographic press at the subject corrugated cardboard manufacturing facility. This facility is located in Orange County at 711 East Lancaster Road in Orlando, Florida.

Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Draft Permit 0951333-004-AC and Appendices; and the Technical Evaluation and Preliminary Determination. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact John Kasper, the engineer for this project, at 407-836-1400.

Sincerely,

Reneé H. Parker
Environmental Program Supervisor
Air Quality Management
Orange County Environmental Protection Division

Enclosures

(4) JK/RHP:bh

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an Application for Air Permit by:

International Paper
711 East Lancaster Road
Orlando, FL 32809

Air Permit Number: 0951333-004-AC
Permit Expires: December 31, 2014

Authorized Representative:
Mark Bullard, Florida Complex General Manager

International Paper Orlando Container Plant
Minor Source Air Construction Permit
Project Name: Add Fourth Press

Facility Location: International Paper operates the International Paper Orlando Container Plant, a corrugated cardboard box manufacturing facility that is located in Orange County at 711 East Lancaster Road in Orlando, Florida.

Project: This air construction permit authorizes construction of one Ward Model SV 16000 3 color flexographic printer and rotary die cutter, the fourth press at the facility. There is no change to emissions or material usage limits in the current permit. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required for the proposed construction. The Permitting Authority responsible for making a permit determination for this project is the Air Quality Management section of the Orange County Environmental Protection Division (EPD). The EPD's address is 800 Mercy Drive, Suite 4, Orlando, Florida 32808. The EPD's telephone number is 407-836-1400.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact EPD's project engineer for additional information at the address and phone number listed above.

Notice of Intent to Issue Permit: The EPD gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The EPD will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the EPD at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the EPD at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

62-110.106(11), F.A.C.

Comments: The EPD will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the EPD by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the EPD shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Office of the Orange County Attorney, 201 South Rosalind Avenue, Third Floor, Orlando, Florida 32801 (Telephone 407-836-7320). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the EPD for notice of agency action may file a petition within 14 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 (in a proceeding initiated by another party) 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 EPD'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; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority'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 EPD's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of EPD on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Orange County, Orlando, Florida.

Reneé H. Parker
Environmental Program Supervisor
Air Quality Management
Orange County Environmental Protection Division

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by certified 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.

Mark Bullard, International Paper (Mark.Bullard@ipaper.com)
John Kilroy, International Paper (John.Kilroy@ipaper.com)
Tim O'Dell, Environmental Sciences Group (odellt@environmentalsciencesgroup.com)
Corey Houchin, P.E., Environmental Sciences Group, Inc. (houchinc@environmentalsciencesgroup.com)
Tom Lubozynski, P.E., Florida DEP (tom.lubozynski@dep.state.fl.us)
Reneé H. Parker, OCEPD (renee.parker@ocfl.net)

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)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Orange County Environmental Protection Division
Air Quality Management
Draft Synthetic Minor Source Air Construction Permit
Project Number 0951333-004-AC
International Paper
Orange County, Florida

Applicant: The applicant for this project is International Paper. The applicant's authorized representative and mailing address are: Mark Bullard, Florida Complex General Manager, International Paper Orlando Container Plant, 711 East Lancaster Road, Orlando, Florida 32809.

Facility Location: International Paper operates the International Paper Orlando Container Plant corrugated cardboard box manufacturing facility that is located in Orange County at 711 East Lancaster Road in Orlando, Florida.

Project: This air construction permit authorizes construction of one Ward Model SV 16000 3 color flexographic printer and rotary die cutter, the fourth press at the facility. There is no change to emissions or material usage limits in the current permit.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required for the proposed construction. The Permitting Authority responsible for making a permit determination for this project is the Air Quality Management section of the Orange County Environmental Protection Division (EPD). The EPD's address is 800 Mercy Drive, Suite 4, Orlando, Florida 32808. The EPD's telephone number is 407-836-1400.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the EPD. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the EPD's project engineer for additional information at the address and phone number listed above.

Notice of Intent to Issue Air Permit: The EPD gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The EPD will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The EPD will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the EPD by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the EPD shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

(Public Notice to be Published in the Newspaper)

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Office of the Orange County Attorney, 201 South Rosalind Avenue, Third Floor, Orlando, Florida 32801 (Telephone 407-836-7320). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the EPD for notice of agency action may file a petition within 14 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 (in a proceeding initiated by another party) 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 EPD'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; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the EPD'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 EPD's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the EPD on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

***** DRAFT PERMIT *****

PERMITTEE

International Paper
711 East Lancaster Road
Orlando, FL 32809

Air Permit Number: 0951333-004-AC
Permit Expires: December 31, 2014

Authorized Representative:
Mark Bullard, Florida Complex General Manager

International Paper Orlando Container Plant
Minor Source Air Construction Permit
Project Name: Add Fourth Press

This is the final air construction permit, which authorizes construction of a fourth flexographic press at the facility. The proposed work will be conducted at the International Paper Orlando Container Plant, which is a corrugated cardboard box manufacturing facility (Standard Industrial Classification Number 2653 for Corrugated and Solid Fiber Boxes). The facility is located in Orange County at 711 East Lancaster Road in Orlando, Florida. The Latitude/Longitude coordinates are: 28°27'56" N Latitude / 81°22'7" W Longitude. As noted in the Final Determination provided with this final permit, no or only minor changes and clarifications were made to the draft permit.

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 (The attached Appendices are enforceable parts of this permit):
 - Appendix A. Citation Formats and Glossary of Common Terms
 - Appendix B. General Conditions
 - Appendix C. Common Conditions

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

Executed in Orange County, Florida

(DRAFT)

| | |
|---|--------|
| | |
| Reneé H. Parker | (Date) |
| Environmental Program Supervisor | |
| Air Quality Management | |
| Orange County Environmental Protection Division | |

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 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.

- Mark Bullard, International Paper (Mark.Bullard@ipaper.com)
- John Kilroy, International Paper (John.Kilroy@ipaper.com)
- Tim O’Dell, Environmental Sciences Group (odellt@environmentalsciencesgroup.com)
- Corey Houchin, P.E., Environmental Sciences Group, Inc. (houchinc@environmentalsciencesgroup.com)
- Tom Lubozynski, P.E., Florida DEP (tom.lubozynski@dep.state.fl.us)
- Reneé H. Parker, OCEPD (renee.parker@ocfl.net)

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.

(DRAFT)

| | |
|---------|--------|
| | |
| (Clerk) | (Date) |

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The International Paper Orlando Container Plant makes corrugated cardboard, then cuts out boxes from the cardboard and prints labels on the boxes. This synthetic non-Title V source facility includes three flexographic printing presses, a scrap recovery system, a starch silo, and a dual fuel boiler and equipment exempt from air permitting.

The existing facility has three flexographic printing presses as described in the table below. In addition to printing, these presses may cut, fold or glue cardboard into the desired box configuration. The inks and glues used contain HAP and VOC. All presses use water-based inks that contain less than 5% VOC.

| Facility ID Number 0951333 | | | | |
|-----------------------------------|--|---|-----------------------------|---|
| EU | Emission Unit Description | | | |
| 001 | <u>Flexographic Printing Presses</u> | | | |
| | Printing Press | Other Capabilities: Cutting/Folding/Gluing | Maximum Ink Usage, ton/yr | Maximum Glue Usage, ton/yr |
| | MHI/EVOL 3237 | Folding/Gluing | 536 | 268 |
| | Langston/EG-167 | Cutting/Folding/Gluing | 723 | 361 |
| | Martin/Maxi DRO 4202 | Cutting | 923 | 0 |
| 002 | <u>Scrap Recovery System and Cyclone</u> | | | |
| | Air Flow, ACFM | Cyclone | Cyclone Efficiency, % | Baler Scrap Throughput, TPH |
| | 76,000 | Mid-South Conveying Cyclone Model MSC-18-10 | 95 | 5.44 |
| 003 | <u>Starch Silo and Dust Collector</u> | | | |
| | Silo Capacity, Cubic Feet | Throughput, TPY | Dust Collector Manufacturer | Dust Collector Model Number |
| | 5,400 | 2,000 | CP Environmental, Inc | CBFB 016 C22 |
| 004 | <u>Dual Fuel Boiler</u> | | | |
| | Heat Input, MMBTU/hr | Manufacturer | Model Number | Fuels |
| | 14.3 | Cleaver Brooks | CD-200-350-250 | Natural gas, Number 2 oil with 0.5% S max |

Exempt Equipment in Existing Facility

The facility has one Cleaver Brooks boiler rated at 14.645 MMBTU/hr and one Superior boiler rated at 4.2 MMBTU/hr, both fired with natural gas. Natural gas-fired boilers and water heaters that meet the criteria for a categorical exemption in Rule 62-210.300(3)(a)34., F.A.C., for fossil fuel steam generators, hot water generators and other external combustion heating units, are exempt from air permitting if they meet those exemption criteria. The facility must keep records to verify that the equipment meets those exemption criteria. For this facility, those exemption criteria are:

- a. No unit shall be subject to any unit specific applicable requirement;
- b. The rated heat input capacity of each unit must be less than 100 MMBTU/hr, and the total heat input of all units combined must be less than 250 MMBTU/hr;
- c. The facility-wide natural gas consumption must not exceed 375 MMCF per consecutive 12 months.

The facility also has a small parts washer that uses an aqueous cleaning solution and is exempt from air permitting because no VOC or HAP is emitted.

SECTION 1. GENERAL INFORMATION (DRAFT)

Project Description

This permit authorizes new construction of a fourth flexographic press with rotary die cutter at the existing corrugated cardboard box manufacturing facility. There is no change to ink or glue usage limits, or VOC or HAP emission limits. The proposed construction consists of the following.

| Facility ID Number 0951333 | | | | |
|-----------------------------------|---|---|------------------------------|-------------------------------|
| EU | Description of Proposed New Construction | | | |
| 001 | <u>Flexographic Printing Presses</u> | | | |
| | Printing Press | Other Capabilities: Cutting/Folding/Gluing | Maximum Ink Usage, ton/yr | Maximum Glue Usage, ton/yr |
| | Ward Model SV 16000 | Cutting | 1358 | 0 |

FACILITY REGULATORY CLASSIFICATION

- The facility is a synthetic non-Title V source of VOC and HAP.
- The facility is not a major source of 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.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting & Compliance Authority: The permitting authority for this project is the Orange County Environmental Protection Division (EPD). All documents related to applications for permits to operate emission units and compliance activities such as reports, tests, and notifications shall be submitted to EPD. The mailing address and phone number of the EPD is 800 Mercy Drive, Orlando, FL 32808 and 407-836-1400.
2. 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.
3. 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.; Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C.; and Orange County Ordinances Chapter 15 Article III. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
4. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, EPD may require the permittee to conform to new or additional conditions. EPD shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, EPD may grant additional time.
[Rule 62-4.080, F.A.C.]
5. Modifications: The permittee shall notify the EPD 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 EPD. 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.]
6. Annual Operating Reports: The permittee shall prepare and submit Annual Operating Reports in accordance with the requirements specified in Appendix C (Common Conditions) of this permit.
[Rule 62-210.370(3), F.A.C.]
7. Application for Operating Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with EPD rules. An air operation permit revision is required for regular operation of the permitted emission units. The permittee shall apply for an air operation permit revision at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of proposed new construction. To apply for an air operation permit revision, the applicant shall submit the appropriate application form, the appropriate fee listed in Rule 62-4.050(4), and such additional information as EPD may by law require. The application shall be submitted to the EPD.
[Rules 62-4.030, 62-4.050, 62-4.220 F.A.C.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (DRAFT)

EU 001, Flexographic Printing Presses

This section of the permit addresses the proposed new construction.

| Facility ID Number 0951333 | | | | |
|----------------------------|--|---|------------------------------|-------------------------------|
| EU | Description of Proposed New Construction | | | |
| 001 | Flexographic Printing Presses | | | |
| | Printing Press | Other Capabilities: Cutting/Folding/Gluing | Maximum Ink Usage, ton/yr | Maximum Glue Usage, ton/yr |
| | Ward Model SV 16000 | Cutting | 1358 | 0 |

EQUIPMENT

1. New Flexographic Printing Press: The permittee is authorized to construct one Marquip Ward United Corporation Model SV 16000 three color flexographic press with rotary die cutter. The press has a maximum throughput rate of 934,727 MMin²/yr, and a maximum ink usage rate of 216,975 gal/yr (1358 ton/yr maximum). There is no change to existing permit limits on ink consumption and glue consumption. [Permit application received July 15, 2013]

OPERATING RESTRICTIONS

2. Hours of Operation: The facility is permitted to operate continuously. [Rule 62-210.200, F.A.C., Construction permit 0951333-001-AC, Permit application received July 15, 2013]
3. Ink Consumption: Total ink consumption shall not exceed 3,139 tons per consecutive 12 months. [Rule 62-4.070(3), F.A.C., Permit 0951333-001-AC, Permit application received July 15, 2013]
4. Glue Consumption: Total glue consumption shall not exceed 629 tons per consecutive 12 months. [Rule 62-4.070(3), F.A.C., Permit 0951333-001-AC, Permit application received July 15, 2013]
5. Unconfined Particulate Matter: No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions include the following:
 - a. Paving and maintenance of roads, parking areas and yards;
 - b. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne;
 - c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.[Rule 62-296.320(4)(c), F.A.C., Permit 0951333-001-AC]
6. VOC Handling Requirements: No person shall store, pump, handle, process, load, unload or use in any process or installation, VOC or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by EPD. To comply, procedures to minimize pollutant emissions should include but not be limited to the following:
 - a. Tightly cover or close all VOC containers when they are not in use;
 - b. Tightly cover, where possible, all open troughs, basins, baths, tanks, etc., when they are not in use;
 - c. Maintain all piping, valves, fitting, etc., in good operating condition;
 - d. Prevent excessive air turbulence across exposed VOC;
 - e. Immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.[Rule 62-296.320(1), F.A.C., Permit 0951333-001-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (DRAFT)

EU 001, Flexographic Printing Presses

EMISSIONS STANDARDS

7. VOC Emission Limit: VOC emissions from all printing press operations shall not exceed 88.0 tons per consecutive 12 months.
[Rules 62-4.070(3) and 62-210(200)(PTE), F.A.C., Permit 0951333-001-AC, Permit application received July 15, 2013]
8. HAP Emission Limit: Emissions of individual and combined HAP shall each not exceed 9.0 tons per consecutive 12 months.
[Rule 62-4.070 (3) and 62-210(200)(PTE), F.A.C., Permit 0951333-001-AC, Permit application received July 15, 2013]

RECORDS AND REPORTS

9. Recordkeeping log: In order to demonstrate compliance with specific condition numbers 3, 4, 7, and 8, the permittee shall maintain a log. The log shall be completed within 30 days of the end of the month reported, and shall be retained on file at the facility for at least five years from the date the data is recorded. The log shall contain the following for each month:
 - a. Designation of month and year of operation for which records are being tabulated;
 - b. Monthly and consecutive 12-month totals of usages of inks and glues;
 - c. VOC and HAP contents of inks and glues used at the facility;
 - d. Monthly and consecutive 12-month totals of facility-wide VOC emissions;
 - e. Monthly and consecutive 12-month totals of facility-wide individual and combined HAP emissions.[Rule 62-4.070(3), F.A.C.]

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month.

[Rule 62-297.310(8), F.A.C.]

SECTION 4. APPENDIX A (DRAFT)
Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit

“AO” identifies the permit as an Air Operation Permit

“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located

“2222” represents the specific facility ID number for that county

“001” identifies the specific permit project number

“AC” identifies the permit as an air construction permit

“AF” identifies the permit as a minor source federally enforceable state operation permit

“AO” identifies the permit as a minor source air operation permit

“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality

“FL” means that the permit was issued by the State of Florida

“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

SECTION 4. APPENDIX A (DRAFT)

Citation Formats and Glossary of Common Terms

| | |
|---|--|
| CFR: Code of Federal Regulations | MW: megawatt |
| CAA: Clean Air Act | NESHAP: National Emissions Standards for Hazardous Air Pollutants |
| CMS: continuous monitoring system | NO_x: nitrogen oxides |
| CO: carbon monoxide | NSPS: New Source Performance Standards |
| CO₂: carbon dioxide | O&M: operation and maintenance |
| COMS: continuous opacity monitoring system | O₂: oxygen |
| DARM: Division of Air Resource Management | Pb: lead |
| DEP: Department of Environmental Protection | PM: particulate matter |
| Department: Department of Environmental Protection | PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less |
| dscf: dry standard cubic feet | ppm: parts per million |
| dscfm: dry standard cubic feet per minute | ppmv: parts per million by volume |
| EPA: Environmental Protection Agency | ppmvd: parts per million by volume, dry basis |
| EPD: Orange County Environmental Protection Division | QA: quality assurance |
| ESP: electrostatic precipitator (control system for reducing particulate matter) | QC: quality control |
| EU: emissions unit | PSD: prevention of significant deterioration |
| F.A.C.: Florida Administrative Code | psi: pounds per square inch |
| F.A.W.: Florida Administrative Weekly | PTE: potential to emit |
| F.D.: forced draft | RACT: reasonably available control technology |
| F.S.: Florida Statutes | RATA: relative accuracy test audit |
| FGD: flue gas desulfurization | RBLC: EPA's RACT/BACT/LAER Clearinghouse |
| FGR: flue gas recirculation | SAM: sulfuric acid mist |
| Fl: fluoride | scf: standard cubic feet |
| ft²: square feet | scfm: standard cubic feet per minute |
| ft³: cubic feet | SIC: standard industrial classification code |
| gpm: gallons per minute | SIP: State Implementation Plan |
| gr: grains | SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides) |
| HAP: hazardous air pollutant | SO₂: sulfur dioxide |
| Hg: mercury | TPD: tons/day |
| I.D.: induced draft | TPH: tons per hour |
| ID: identification | TPY: tons per year |
| kPa: kilopascals | TRS: total reduced sulfur |
| kW: kilowatt | UTM: Universal Transverse Mercator coordinate system |
| lb: pound | VE: visible emissions |
| MACT: maximum achievable control technology | VOC: volatile organic compounds |
| MMBtu: million British thermal units | |
| MSDS: material safety data sheets | |

SECTION 4. APPENDIX B (DRAFT)

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that EPD will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by EPD.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and EPD rules, unless specifically authorized by an order from FDEP and EPD.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by EPD rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by EPD rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized EPD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or EPD rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide EPD with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all

SECTION 4. APPENDIX B (DRAFT)

General Conditions

damages which may result and may be subject to enforcement action by EPD for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to EPD may be used by EPD as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or EPD rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in EPD rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or EPD rules.
11. This permit is transferable only upon EPD approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by EPD.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under EPD rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by EPD;
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by EPD rule;
 - c. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates the analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. When requested by EPD, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to EPD, such facts or information shall be corrected promptly.
16. All air pollution sources located in Orange County are subject to the Orange County Code of Ordinances, including Chapter 15, Article III, Air Quality Control.

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify EPD as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations.
[Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly.
[Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by EPD for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision.
[Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by EPD.
[Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by EPD.
[Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. General 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 equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4)(b)1, F.A.C.]

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary.
[Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

10. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to EPD upon request.
[Rule 62-213.440(1)(b)2, F.A.C.]
11. Supporting Documentation: Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA “As Supplied” data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products, which includes sufficient information to determine usage rates and emissions. These records shall be made available to EPD upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage and emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least five years. Daily logs shall be completed within 7 business days.
[Rule 62-4.070(3), F.A.C.]
12. Emissions Computation and Reporting:

- a. *Applicability*. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit.
[Rule 62-210.370(1), F.A.C.]

- b. *Computation of Emissions*. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.

(1) *Basic Approach*. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.

- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to EPD that an alternative approach is more accurate because the CEMS represents still-emerging technology;
- (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

operator shall use such methodology, unless the owner or operator demonstrates to EPD that an alternative approach is more accurate;

- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to EPD that an alternative approach is more accurate.

(2) Mass Balance Calculations.

- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
- (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
- (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.

(3) Emission Factors.

- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the EPD that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit;
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed;
 - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not

SECTION 4. APPENDIX C (DRAFT)

Common Conditions

compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.

- b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (4) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (5) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (6) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (7) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the EPD for any regulatory purpose.
[Rule 62-210.370(2), F.A.C.]
- c. *Annual Operating Report for Air Pollutant Emitting Facility.*
 - (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - a. All synthetic non-Title V sources.
 - b. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
 - (2) The annual operating report shall be submitted to EPD by April 1 of the following year. If the report is submitted using the FDEP electronic annual operating report software, there is no requirement to submit a copy to EPD.
 - (3) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
[Rule 62-210.370(3), F.A.C.]
- d. *Facility Relocation.* Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to EPD at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.
[Rule 62-210.370(4), F.A.C.]

**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

APPLICANT

International Paper
711 East Lancaster Road
Orlando, Orange County, Florida 32809

Facility ID Number 0951333

PROJECT

Application for Minor Source Air Construction Permit
Project Number: 0951333-004
Project Name: Add Fourth Press

PERMITTING AUTHORITY

Orange County Environmental Protection Division
Air Quality Management
800 Mercy Drive
Suite 4
Orlando, Florida 32808

August 13, 2013

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

In accordance with the terms of its Specific Operating Agreement, the Orange County Environmental Protection Division (EPD) has been delegated the authority to process this application on behalf of the Department.

Glossary of Common Terms

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

Facility Description and Location

The International Paper Orlando Container Plant is an existing synthetic non-Title V source, which is categorized under Standard Industrial Classification Code Number 2653 for Corrugated and Solid Fiber Boxes. The facility is located in Orange County at 711 East Lancaster Road in Orlando, Florida. The latitude and longitude of the site are 28°27'56" N Latitude / 81°22'7" W Longitude, respectively. This site is in an area that is in attainment (Orange County is an attainment maintenance area) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is a synthetic non-Title V source of VOC and HAP.
- The facility is not a major source of HAP.
- The facility has no emission units subject to the acid rain provisions of the Clean Air Act.
- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

This permit authorizes new construction of a fourth flexographic press with rotary die cutter at the existing corrugated cardboard box manufacturing facility. There is no change to ink or glue usage limits, or VOC or HAP emission limits. The proposed construction consists of the following.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

| | | | | |
|-----------------------------------|---|---|------------------------------|-------------------------------|
| Facility ID Number 0951333 | | | | |
| EU | Description of Proposed New Construction | | | |
| 001 | <u>Flexographic Printing Presses</u> | | | |
| | Printing Press | Other Capabilities: Cutting/Folding/Gluing | Maximum Ink Usage, ton/yr | Maximum Glue Usage, ton/yr |
| | Ward Model SV 16000 | Cutting | 1358 | 0 |

The proposed facility remains a synthetic non-Title V source.

Processing Schedule

- 07/15/13 Received the application and processing fee for a minor source air construction permit, starting the permit clock.
- 08/09/13 Application review results: application complete.
- 08/13/13 Mail Written Notice of Intent to Issue Air Permit, Public Notice of Intent to Issue Air Permit, and Draft Construction Permit.

2. PSD APPLICABILITY

This is a synthetic minor source construction permit project with no change in existing permit limits on emissions. PSD does not apply to such a minor source.

3. APPLICATION REVIEW

Discussion of Emissions

Air emissions from this facility are VOC and HAP from the printing and gluing operations, particulate matter from the scrap recovery system with cyclone and the starch silo pneumatic loading operation, and criteria pollutants from combustion of natural gas and Number 2 fuel oil in the boilers. This facility uses water based inks with low VOC content.

The proposed printing operation will be a fourth flexographic press. The four presses may combine the operations of printing with cardboard cutting, folding and gluing. The potential VOC and HAP emissions from the presses depend on the ink and glue usages and compositions. The permit limits on ink and glue usages are unchanged from the 0951333-001-AC permit and the potential emissions of VOC and HAP are shown below in Table TE-1. These values come from the 0951333-001-AC permit. The exempt boilers' PTE in that table was calculated based on AP-42 emission factors and the 375 MMCF/yr fuel consumption limit in the categorical exemption in Rule 62-210.300(3)(a)34., F.A.C. This calculation was omitted from the 0951333-001-AC permit technical evaluation, but is added here for completeness.

Table TE-1. Potential Emissions Summary for Emission Units at the International Paper Plant

| Pollutant | EU 001 (Printing) PTE, TPY | EU 002 (Cyclone) PTE, TPY | EU 003 (Silo) PTE, TPY | EU 004 (Boiler) PTE, TPY | Total Regulated EU PTE, TPY | Exempt Boilers PTE, TPY |
|----------------|----------------------------------|---------------------------------|------------------------------|--------------------------------|-----------------------------------|-------------------------------|
| NOx | | | | 8.9 | 8.9 | 18.8 |
| CO | | | | 5.3 | 5.3 | 15.8 |
| SO2 | | | | 31.7 | 31.7 | 0.1 |
| VOC | 87.4 | | | 0.3 | 87.7 | 1.0 |
| PM | | 2.4 | 0.2 | 0.9 | 3.5 | 1.4 |
| Total HAP | 8.4 | | | | 8.4 | |
| Individual HAP | 8.4 | | | | 8.4 | |

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Table TE-2 shows the total regulated emission unit potential emissions, plus the exempt emission unit potential emissions, and the Title V thresholds.

Table TE-2. Potential Emissions (PTE) and Title V Threshold Summary for Facility.

| Pollutant | Regulated EU PTE, TPY | Permit Limit, TPY | Exempt Boilers PTE, TPY | Facility-Wide PTE, TPY | Title V Threshold, TPY |
|-----------------------|--------------------------|----------------------|----------------------------|---------------------------|---------------------------|
| NO _x | 8.9 | | 18.8 | 27.7 | 100 |
| CO | 5.3 | | 15.8 | 21.1 | 100 |
| SO ₂ | 31.7 | | 0.1 | 31.8 | 100 |
| VOC | 87.7 | 88.0 | 1.0 | 89.0 | 100 |
| PM | 3.5 | | 1.4 | 4.9 | 100 |
| Total HAP | 8.4 | 9.0 | | 9.0 | 25 |
| Individual HAP | 8.4 | 9.0 | | 9.0 | 10 |

With the proposed equipment, the facility remains a synthetic non-Title V source with potential emissions less than Title V thresholds. Recordkeeping is required to verify that VOC and HAP emissions remain below Title V thresholds, and that fuel consumption remains below exemption criteria limits for the exempt boilers.

State Requirements

- 62-4.070(3) Permit standards
- 62-210.200 Definitions
- 62-210.300(3) Exemptions
- 62-210.370 Emissions computation and reporting
- 62-210.370(3) AOR requirements
- 62-296.320(2) Objectionable odor prohibition
- 62-296.320(4)(b) General visible emission standard

Federal NSPS Provisions

None

Federal NESHAP Provisions

None

Other Draft Permit Requirements

Orange County Ordinance Chapter 15 Article III

4. PRELIMINARY DETERMINATION

The EPD makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. John Kasper is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Orange County Environmental Protection Division, 800 Mercy Drive, Suite 4, Orlando, Florida 32808, 407-836-1400.