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ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

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

Dear Mr. Bullard:

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

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

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

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

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on FEB. 9, 2015 to the listed persons.

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

Jeannette Figare 2/9/15
Clerk Date

FINAL DETERMINATION

FOR

International Paper Company, Plant City Facility

Hillsborough County

Construction Permit

Application Number

0571029-022-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

February 9, 2015

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on January 7, 2015 that included an Intent to Issue Permit No. 0571029-022-AC to International Paper Company, Plant City Facility. The facility is located at 2402 Police Center Drive, Plant City, Hillsborough County, FL 33566. This permit authorizes an increase in the grain loading limit of the scrap collection system baghouse and an increase in the ink usage limit.

The Public Notice of Intent to Issue was published in the Tampa Bay Times on January 23, 2015.

COMMENTS/CHANGES

No comments were received from the applicant or the public.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the permit as drafted with the changes noted above.

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

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

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

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

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

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

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

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

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

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

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

UTM: 17-391.21E 3095.89N

NEDS NO: 0571029

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

References Permit No.: 0571029-020-AC

Replaces Permit No.: NA

SPECIFIC CONDITIONS:

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

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

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

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

A)

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

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

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

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

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

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

SPECIFIC CONDITIONS:

consecutive month period:

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

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

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

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

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

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

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

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

SPECIFIC CONDITIONS:

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

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

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

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

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

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

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

APPENDIX A – 40 CFR 63.9(b)

Facility: International Paper Company
Facility No: 0571029

Initial notifications. [40 CFR 63.9(b)]

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

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

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

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

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

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

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

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

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

(3) [Reserved]

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

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

(ii)-(iv) [Reserved]

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

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

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

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

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

ATTACHMENT - GENERAL CONDITIONS

(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 the Department 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 the Department.

(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 Department rules, unless specifically authorized by an order from the Department.

(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 Department 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 Department rules.

(7) The permittee, by accepting this permit, specifically agrees to allow authorized Department 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 Department 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 the Department 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 damages which may result and may be subject to enforcement action by the Department 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 the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department 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 Department 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 Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

(11) This permit is transferable only upon Department 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 the Department.

(12) This permit or a copy thereof shall be kept at the work site of the permitted activity.

(13) This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Compliance with New Source Performance Standards

(14) The permittee shall comply with the following:

(a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
(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 Department rule.

(c) Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements;
2. The person responsible for performing the sampling or measurements;
3. The dates analyses were performed;
4. The person responsible for performing the analyses;
5. The analytical techniques or methods used;
6. The results of such analyses.

(15) When requested by the Department, 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 the Department, such facts or information shall be corrected promptly.