FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

FINAL PERMIT

PERMITTEE

Rocktenn CP, LLC
600 North 8th Street
Fernandina Beach, FL 32034

Authorized Representative:
Mr. Alton Thompson, Business Unit General Manager

Air Permit No. 0810174-007-AF
Permit Expires: 08/09/2018
Rocktenn Bradenton Container Plant
Minor Air Federally Enforceable State Operation Permit (FESOP)
Air Operation Permit Renewal

This is the final permit to renew Air Operation Permit No. 0810174-005-AF for a corrugated box manufacturing plant at the Rocktenn Bradenton Container Plant (Standard Industrial Classification No. 2653). The facility is located in Manatee County at 1675 Ninth Street East in Bradenton, Florida. The UTM coordinates are Zone 17, 346.5 km East, and 3041.1 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

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

This air pollution 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.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

All petitions filed under these rules shall contain:

(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 the petitioner received notice of the agency decision;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the 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 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 Department'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 of the Florida Administrative Code.

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

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

Kelley M. Boatwright
District Air Program Administrator
Southwest District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) was sent by 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 the date indicated below to the persons listed below.

Alton Thompson, Business Unit General Manager
Rocktenn CP, LLC
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Rachel Davis, Environmental Services Manager
Rocktenn CP, LLC
rgdavis@rocktenn.com

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Erin DiBacco, SWD Compliance Enforcement Team Leader
Florida Department of Environmental Protection
Erin.Dibaccho@dep.state.fl.us

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.

_____ 08/09/2013
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This is a corrugated box manufacturing plant. The existing facility consists of the following emissions units (EUs).

Facility ID No. 0810174	
EU ID No.	**Emissions Unit Description**
001	Cleaver-Brooks Boiler
002	Corrugator, Shredder, Printing & Finishing

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Sources/Activities

Hazardous air pollutant (HAP) and volatile organic compound (VOC) emissions associated with printing and finishing processes located at the corrugated box manufacturing area are exempt. These operations include two die-cut presses, adhesive mixing and application (water-based adhesive), and three (3) flexographic printing presses. No solvent-based inks are used at this facility. HAPs and VOCs are emitted fugitively.
[Rule 62-210.300(3)(b)1., F.A.C. *(Generic Emissions Unit or Activity Exemption)*]

A 90,000 lb capacity starch storage silo which has an annual loading rate of approximately 1,800 tons/year is used to store starch which is delivered by truck and pneumatically conveyed to the silo. The particulate matter (PM) emissions from the silo generated during silo filling operations are controlled by a Griffin baghouse dust collector (model 36-4X) mounted on the top of silo. The uncontrolled emissions from this storage silo are less than one ton/year.

This activity was previously permitted as EU No. 003.

[Rule 62-210.300(3)(b)1., F.A.C. *(Generic Emissions Unit or Activity Exemption)*]

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- 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 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutant particulate matter less than 10 microns (PM_{10}). The emission limitations and restriction on the type or amount of material processed in this permit will ensure that the facility's PM_{10} emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

This permit replaces FESOP No. 0810174-005-AF.

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;

b. Appendix B. General Conditions;

c. Appendix C. Common Conditions;

d. Appendix D. Common Testing Requirements; and

e. Appendix E. Best Available Control Technology (BACT) Determination (dated 6/17/1997).

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

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

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

c. copies of the most recent compliance test reports required by Specific Condition Nos. A.8. and B.7., if not previously submitted; and

d. copies of the most recent month of records/logs specified in Specific Condition Nos. A.9. and B.8.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

FACILITY-WIDE SPECIFIC CONDITIONS

Operation and Emission Limitations

9. Operating Hours - The facility is permitted to operate continuously (i.e. 8,760 hours per year).
[Rule 62-210.200 (Definition "Potential to Emit"), F.A.C.; FESOP No. 0810174-005-AF]

10. General Pollutant Emission Limiting Standards – Organic Solvent/Volatile Organic Compound Emissions - The permittee shall not store, pump, handle, process, load, unload, or use in any process or installation organic solvents (OS) or VOCs without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

a. maintain tightly fitting cover, lids, etc, on all containers of OS/VOCs when they are not being handled, tapped, etc.;

b. prevent excessive air turbulence across exposed OS/VOCs;

c. where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, bath, etc. of OS/VOCs so that it can be covered when not in use;

d. all fittings, valve lines, etc. shall be properly maintained;

e. all OS/VOC spills shall be attended to immediately and the waste properly disposed of, recycled, etc.

[Rules 62-4.070(3) and 62-296.320(1)(a), F.A.C.; FESOP No. 0810174-005-AF]

Compliance Testing Requirements

11. Test Notification - The permittee shall notify the Air Compliance Section of the Department's Southwest District in writing 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 test contact person who will be responsible for coordinating and having such test conducted.
[Rule 62-297.310(7), F.A.C.]

Recordkeeping Requirements

12. Record Retention - The records required by this permit shall be maintained at the facility for a minimum of three (3) years and made available to the Department upon request.
[Rule 62-4.160(14)(b), F.A.C.]

13. Record Completion - Daily records shall be completed within three (3) business days and monthly records shall be completed by the end of the following month.
[Rule 62-4.070(3) F.A.C.; FESOP No. 0810174-005-AF]

A. EU No. 001 Cleaver-Brooks Boiler

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

EU ID No.	Emissions Unit Description
001	Cleaver-Brooks Boiler - The boiler is a 16.75 million British thermal unit per hour (MMBtu/hour) heat input Cleaver-Brooks boiler (Model CB700-400-200) that is used to provide process steam. It is fired primarily with natural gas; alternately, it may be fired with propane as a backup fuel.

PERFORMANCE RESTRICTIONS

A.1. Federal Regulatory Requirements - This emissions unit is subject to 40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units which is adopted by reference in Rule 62-204.800, F.A.C.

(Permitting Note: Under the current configuration (i.e., heat input rate of 16.75 MMBtu/hr and fired with natural gas or propane), the only applicable requirement is recordkeeping. See Specific Condition No. A.9.)

[Rule 62-204.800(8), F.A.C.; 40 CFR 60.40c through 60.48c]

A.2. Permitted Capacity – By design, the boiler is limited to a maximum heat input rate of 16.75 MMBtu/hour.

(Permitting Notes: The maximum heat input rate represents the manufacturer's maximum design heat input rates on a steady state basis as determined by the physical design and characteristics of each boiler. Therefore this permit does not contain any recordkeeping requirements to document compliance with this maximum rate. It is to be used for testing purposes only (see Specific Condition No. A.5.

See Appendix D, Condition 1, for operation rate during testing requirements.)

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; Construction Permit No. 0810174-002-AC]

A.3. Best Available Control Technology - Authorized Fuel - The BACT determination conducted for this process steam boiler (*see Attachment E.*) limits the firing of the boiler to natural gas as primary fuel and propane as a back-up fuel.
[Rules 62-296.406(2) and (3), F.A.C.; Construction Permit No. 0810174-002-AC]

EMISSIONS STANDARDS

A.4. Visible Emissions Limitations - Visible emissions (VE) from the boiler shall not exceed 20% opacity, except for one two-minute period per hour during which opacity shall not exceed 40%.
[Rule 62-296.406(1), F.A.C.]

COMPLIANCE TESTING REQUIREMENTS

A.5. Visible Emissions (VE) Compliance Tests - The boiler exhaust stack shall be tested to demonstrate compliance with the visible emissions limitations between 105 and 365 days prior to the expiration date of this permit.
[Rule 62-297.310(7)(a)3., F.A.C.]

A.6. Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.7. Compliance Test Method - Required compliance tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources (Minimum of 60 minutes in duration)

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.
[Rule 62-204.800, F.A.C.; Appendix A of 40 CFR 60]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.8. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit
[Rule 62-297.310(8), F.A.C.]

A.9. Monthly Fuel Usage Log - Pursuant to 40 CFR 60.48c NSPS Subpart Dc, the permittee is required to maintain records of the amount of fuel combusted by this boiler. Records of the amount of natural gas and propane combusted during each calendar month shall be kept.
[40 CFR 60.48c(g)(2); Rule 62-204.800(7), F.A.C.]

B. EU No. 002 Corrugator, Shredder, Printing & Finishing

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

EU ID No.	Emissions Unit Description
002	Corrugator, Shredder, Printing & Finishing - The corrugator and shredder are in the corrugated box manufacturing area. Scrap paperboard resulting from trimming and cutting during the manufacturing process is collected and bailed. Particulate matter (PM) emissions from the corrugator, shredder, and the die-cut presses are controlled by a cyclone separator. Hazardous air pollutant (HAP) and volatile organic compound (VOC) emissions associated with printing and finishing processes located at the corrugated box manufacturing area are exempt.

PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity - The maximum allowable production rate for this plant is1,800 million square feet (MMSF) of paperboard per any consecutive 12-month period.

(Permitting Note –Testing shall take place while the scrap collection system is operating at an average rate of 1,400 lbs/hour or higher.)

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; FESOP No. 0810174-005-AF]

EMISSIONS STANDARDS

B.2. Visible Emissions (VE) Limitations - In order to provide reasonable assurance that the cyclone separator is being properly maintained, visible emissions from the cyclone separator should not exceed five percent (5%) opacity. Exceedance of this limit will not a violation in and of itself, but may be an indication that the cyclone separator is not being properly maintained.
[Rule 62-4.070(3), F.A.C.; FESOP No. 0810174-005-AF]

COMPLIANCE TESTING REQUIREMENTS

B.3. Visible Emissions (VE) Testing Requirements - The cyclone separator exhaust shall be tested for visible emissions between 105 and 365 days prior to the expiration date of this permit.
[Rule 62-297.310(7)(a)3., F.A.C.; FESOP No. 0810174-005-AF]

B.4. Operating Rate During Testing - The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Testing shall be conducted while the scrap collection system is operating at an average rate of 1,400 lbs/hour or higher.
[Rule 62-4.070(3), F.A.C.; FESOP No. 0810174-005-AF]

B.5. Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

B.6. Compliance Test Method - Required compliance tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources (Minimum of 30 minutes in duration)

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.
[Rule 62-204.800, F.A.C.; Appendix A of 40 CFR 60]

RECORDKEEPING AND REPORTING REQUIREMENTS

B.7. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. All test reports shall include the estimated scrap collection system operating rate in the test report.
[Rule 62-297.310(8), F.A.C.; FESOP 0810174-005-AF]

B.8. Monthly Records - In order to document compliance with the requirements of Specific Condition No. B.1., the permittee shall record the following:

a. production rate of the facility in million square feet (MMSF) of paperboard for the most recent month; and

b. production rate of the facility in million square feet (MMSF) of paperboard for the most recent consecutive 12-month period.

[Rule 62-4.070(3), F.A.C.; FESOP No. 0810174-005-AF]