

**CERTIFIED MAIL:**

**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

\_\_\_\_\_  
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  
Florida Statutes, with the designated agency clerk,  
receipt of which is hereby acknowledged.

\_\_\_\_\_  
(Clerk) (Date)

**SECTION 1. GENERAL INFORMATION**

**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.

<b>Facility ID Number 0951333</b>				
<b>EU</b>	<b>Emission Unit Description</b>			
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**

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**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.

<b>Facility ID Number 0951333</b>				
<b>EU</b>	<b>Description of Proposed New Construction</b>			
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.

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**SECTION 2. ADMINISTRATIVE REQUIREMENTS**

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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, Suite 4, 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**

**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	<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

**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 MMin<sup>2</sup>/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]

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**SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS**

**EU 001, Flexographic Printing Presses**

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**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**

**Citation Formats and Glossary of Common Terms**

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**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

Citation Formats and Glossary of Common Terms

<b>CFR:</b> Code of Federal Regulations	<b>MW:</b> megawatt
<b>CAA:</b> Clean Air Act	<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants
<b>CMS:</b> continuous monitoring system	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>CO:</b> carbon monoxide	<b>NSPS:</b> New Source Performance Standards
<b>CO<sub>2</sub>:</b> carbon dioxide	<b>O&amp;M:</b> operation and maintenance
<b>COMS:</b> continuous opacity monitoring system	<b>O<sub>2</sub>:</b> oxygen
<b>DARM:</b> Division of Air Resource Management	<b>Pb:</b> lead
<b>DEP:</b> Department of Environmental Protection	<b>PM:</b> particulate matter
<b>Department:</b> Department of Environmental Protection	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>dscf:</b> dry standard cubic feet	<b>ppm:</b> parts per million
<b>dscfm:</b> dry standard cubic feet per minute	<b>ppmv:</b> parts per million by volume
<b>EPA:</b> Environmental Protection Agency	<b>ppmvd:</b> parts per million by volume, dry basis
<b>EPD:</b> Orange County Environmental Protection Division	<b>QA:</b> quality assurance
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>QC:</b> quality control
<b>EU:</b> emissions unit	<b>PSD:</b> prevention of significant deterioration
<b>F.A.C.:</b> Florida Administrative Code	<b>psi:</b> pounds per square inch
<b>F.A.W.:</b> Florida Administrative Weekly	<b>PTE:</b> potential to emit
<b>F.D.:</b> forced draft	<b>RACT:</b> reasonably available control technology
<b>F.S.:</b> Florida Statutes	<b>RATA:</b> relative accuracy test audit
<b>FGD:</b> flue gas desulfurization	<b>RBLC:</b> EPA's RACT/BACT/LAER Clearinghouse
<b>FGR:</b> flue gas recirculation	<b>SAM:</b> sulfuric acid mist
<b>Fl:</b> fluoride	<b>scf:</b> standard cubic feet
<b>ft<sup>2</sup>:</b> square feet	<b>scfm:</b> standard cubic feet per minute
<b>ft<sup>3</sup>:</b> cubic feet	<b>SIC:</b> standard industrial classification code
<b>gpm:</b> gallons per minute	<b>SIP:</b> State Implementation Plan
<b>gr:</b> grains	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>HAP:</b> hazardous air pollutant	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>Hg:</b> mercury	<b>TPD:</b> tons/day
<b>I.D.:</b> induced draft	<b>TPH:</b> tons per hour
<b>ID:</b> identification	<b>TPY:</b> tons per year
<b>kPa:</b> kilopascals	<b>TRS:</b> total reduced sulfur
<b>kW:</b> kilowatt	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>lb:</b> pound	<b>VE:</b> visible emissions
<b>MACT:</b> maximum achievable control technology	<b>VOC:</b> volatile organic compounds
<b>MMBtu:</b> million British thermal units	
<b>MSDS:</b> material safety data sheets	

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**SECTION 4. APPENDIX B**

**General Conditions**

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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 does 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**

**General Conditions**

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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:
    - (1) The date, exact place, and time of sampling or measurements;
    - (2) The person responsible for performing the sampling or measurements;
    - (3) The dates the 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 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.

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**SECTION 4. APPENDIX C**

**Common Conditions**

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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.]

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**SECTION 4. APPENDIX C**

**Common Conditions**

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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

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**SECTION 4. APPENDIX C**

**Common Conditions**

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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**

**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.]

**FINAL DETERMINATION**

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**PERMITTEE**

International Paper  
711 East Lancaster Road  
Orlando, FL 32809

**PERMITTING AUTHORITY**

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

**PROJECT**

Air Permit Number 0951333-004-AC  
Add Fourth Press  
International Paper Orlando Container Plant

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

**NOTICE AND PUBLICATION**

The EPD distributed a Draft Permit package on August 13, 2013. The applicant published the Public Notice in the Orlando Sentinel on August 15, 2013. The EPD received the proof of publication on August 21, 2013. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

**COMMENTS**

No comments on the Draft Permit were received from the public, the applicant, the FDEP's Central District Office or the EPA Region 4 Office.

**CONCLUSION**

The final action is to issue the permit with the minor changes, corrections and clarifications as described above