

CERTIFIED MAIL:

PERMITTEE

International Paper, Inc.
711 East Lancaster Road
Orlando, FL 32809

Air Permit Number: 0951333-005-AO
Permit Expires: April 20, 2017

Authorized Representative:
Mark Bullard
Florida Complex General Manager

Orlando Container Plant
Minor Source Air Operation Permit
Project Name: Revise Operation Permit

This is air operation permit number 0951333-005-AO to operate the above-referenced source. This permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to operate the facility in accordance with the conditions of this permit.

The International Paper Orlando Container Plant is a corrugated packaging 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 and Longitude coordinates are: 28°27'56" N Latitude and 81°22'7" W Longitude.

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: Appendix A. Citation Formats and Glossary of Common Terms;
Appendix B. General Conditions;
Appendix C. Common Conditions;
Appendix D. Common Testing Requirements.

Because of 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.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of the Orange County Attorney, 201 South Rosalind Avenue, Third Floor, Orlando, Florida 32801, within 14 days of receipt of this Permit. 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 Section 120.57, F.S.

All petitions filed under these rules shall contain: (a) The name, address and e-mail address of each agency affected and each agency's file or identification number, if known; (b) The name, address, telephone number and e-mail address of the petitioner; the name, address, telephone number and e-mail address 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.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the final EPD action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by the EPD decision with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of the Orange County Attorney at the above address. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the EPD Clerk unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order by EPD.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Office of the Orange County Attorney at the above address; 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 the Final Order is filed with the Clerk of the EPD.

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 Air Operation 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)
Iliana Martinez, EHS Manager, International Paper (iliana.martinez@ipaper.com)
Corey Houchin, P.E., Environmental Sciences Group, Inc. (houchinc@environmentalsciencesgroup.com)
Tim O'Dell, Environmental Sciences Group, Inc. (odellt@environmentalsciencesgroup.com)
Tom Lubozynski, P.E., Florida DEP (tom.lubozynski@dep.state.fl.us)
Reneé H. Parker, OCEPD (renee.parker@ocfl.net)

Clerk Stamp

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

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

Facility Description

The International Paper Orlando Container Plant is a corrugated packaging manufacturing facility. This facility includes four flexographic printing presses, a scrap recovery system, a starch silo, one regulated dual fuel boiler and exempt boilers fired with natural gas only. This facility is a **synthetic non-Title V source** of VOC and HAP.

Corrugated cardboard is made of three layers of paper. A machine forms corrugations in the middle layer, and sandwiches it between two flat outer layers. Corn starch, mixed with water and some additives, is used to bond the layers of paper together. Steam is applied to the freshly formed and bonded cardboard to heat, cure and dry it. The presses print labels and other information on the cardboard. The inks and glues used contain HAP and VOC. All presses use water-based inks that contain less than 5% VOC. The cardboard can be cut, folded and glued into box forms by knife blades and other equipment that are incorporated into the presses. After cutting, scrap falls out of the press and into air ducts that feed the cyclone. The cyclone separates the scrap from the air. A baling machine assembles and binds scrap into bales for shipment to a recycling plant off site.

Steam is supplied by a 14.288 MMBTU/hr, dual fuel boiler. The boiler is subject to NSPS 40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The boiler is also subject to Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with Less Than 250 Million Btu Per Hour Heat Input, New and Existing Emissions Units. This rule requires BACT for PM and SO₂. BACT for this boiler is limiting fuel use to natural gas or Number 2 fuel oil with a maximum sulfur content of 0.5%.

The facility consists of four regulated emission units (EU) and exempt equipment and activities as shown below.

Facility ID Number 0951333					
EU	Emission Unit Description				
001	<u>Flexographic Printing Presses</u>				
	Printing Press	Other Capabilities: Cutting/Folding/Gluing	Printed Area, MMin ² /yr	Maximum Ink Usage, ton/yr	Maximum Glue Usage, ton/yr
	Langston/EG-167	Cutting/Folding/Gluing	722,737	723	361
	Martin/Maxi DRO 4202	Cutting	923,374	923	0
	MHI/EVOL 3237	Folding/Gluing	536,112	536	268
	Ward Model SV 16000	Cutting	934,727	1358	0
002	<u>Scrap Recovery System and Cyclone</u>				
	Air Flow, ACFM	Cyclone	Cyclone Efficiency, %	Baler	Baler Scrap Throughput, TPH
	76,000	Mid-South Conveying Cyclone Model MSC-18-10	95	Balemaster Model E-810	5.44
003	<u>Starch Silo and Dust Collector</u>				
	Silo Capacity, Cubic Feet	Silo Manufacturer	Dust Collector Manufacturer	Dust Collector Model Number	Cornstarch Throughput, TPY
	5,400	Imperial Industries	CP Environmental, Inc	CBFB 016 C22	2,000
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	

SECTION 1. GENERAL INFORMATION

Exempt Equipment

The following equipment and activities are considered exempt from air permitting if they meet the criteria listed below.

Boilers fired by natural gas only. 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.

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

Project Description

This project is an air operation permit revision that incorporates the addition of a fourth press authorized by construction permit 0951333-004-AC. While the permit was open for revision, the applicable requirements of 40 CFR Part 60 Subpart Dc were added to the specific conditions and the Subpart was removed from the appendices.

FACILITY REGULATORY CLASSIFICATION

- The facility is a synthetic non-Title V source of VOC and HAP.
- The facility is not a major source of HAP.
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting and 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;
 - d. Appendix D. Common Testing Requirements.
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. Permit Renewal: At least 60 days prior to the expiration date of this operation permit, the permittee shall submit to EPD four copies of an operation permit renewal application, along with copies of the required records for the previous 12 months, copies of compliance test results and the appropriate processing fee established in 62-4.050(4), F.A.C.

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

All Emission Units

This section of the permit addresses the following emission units.

Facility ID Number 0951333						
EU	Emission Unit Description					
001	<u>Flexographic Printing Presses</u>					
	Printing Press	Other Capabilities: Cutting/Folding/Gluing		Printed Area, MMin ² /yr	Maximum Ink Usage, ton/yr	Maximum Glue Usage, ton/yr
	Langston/EG-167	Cutting/Folding/Gluing		722,737	723	361
	Martin/Maxi DRO 4202	Cutting		923,374	923	0
	MHI/EVOL 3237	Folding/Gluing		536,112	536	268
	Ward Model SV 16000	Cutting		934,727	1358	0
002	<u>Scrap Recovery System and Cyclone</u>					
	Air Flow, ACFM	Cyclone		Cyclone Efficiency, %	Baler	Baler Scrap Throughput, TPH
	76,000	Mid-South Conveying Cyclone Model MSC-18-10		95	Balemaster Model E-810	5.44
003	<u>Starch Silo and Dust Collector</u>					
	Silo Capacity, Cubic Feet	Silo Manufacturer	Dust Collector Manufacturer	Dust Collector Model Number	Cornstarch Throughput, TPY	
	5,400	Imperial Industries	CP Environmental, Inc	CBFB 016 C22	2,000	
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		

OPERATING RESTRICTIONS

- Hours of Operation: The facility is permitted to operate continuously. [Rule 62-210.200, F.A.C., Permit 0951333-001-AC]
- 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]
- 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]
- BACT (Best Available Control Technology) Determined by EPD: The amount of particulate and sulfur dioxide emissions from the EU 004 dual fuel boiler shall be limited by the firing of natural gas as the primary fuel and Number 2 fuel oil (diesel fuel) with a maximum sulfur content of 0.5%, by weight, as a backup fuel. [Rule 62-296.406(2) and (3), F.A.C., 40 CFR Part 60 Subpart Dc section 60.42c(d), Permit 0951333-001-AC]
- 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:
 - Paving and maintenance of roads, parking areas and yards;

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

All Emission Units

- 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 matter 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, fittings, 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]

EMISSION STANDARDS

- 7. **Boiler Visible Emission Standard:** Visible emissions from the EU 004 Dual Fuel Boiler shall be less than 20% opacity. [Rule 62-296.320(4)(b)1., F.A.C., Permit 0951333-001-AC]
- 8. **Materials Handling Visible Emission Standard:** Visible emissions from the EU 002 Scrap Material Recovery System and Cyclone, and the EU 003 Starch Silo and Dust Collector (bin vent filter), shall be less than 5% opacity. [Rule 62-297.711(2)(a), F.A.C.; Permit 0951333-001-AC]
- 9. **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]
- 10. **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]

TESTING REQUIREMENTS

- 11. **Compliance Test Prior to Operation Permit Renewal:** At least 90 days prior to the expiration of the operation permit, the EU 002 cyclone, EU 003 dust collector and EU 004 boiler shall be tested to demonstrate compliance with the applicable standards for visible emissions. [Rule 62-297.310(7)(a)3, F.A.C.]
- 12. **Test Requirements:** The permittee shall notify EPD in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]
- 13. **Test Methods:** Required tests shall be performed in accordance with the following reference method. Visible emissions compliance tests of EU 002 and EU 003 shall last a minimum of 30 minutes. Visible emissions compliance tests of EU 004 shall last a minimum of 60 minutes.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS

All Emission Units

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 EPD. [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60, Permit 0951333-001-AC]

RECORDS AND REPORTS

14. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(8), F.A.C.]
15. Recordkeeping log: In order to demonstrate compliance with specific conditions numbers 2, 3, 9 and 10, 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 facility-wide Number 2 fuel oil consumption;
 - c. Monthly and consecutive 12-month totals of facility-wide natural gas consumption;
 - d. Monthly and consecutive 12-month totals of usages of inks and glues;
 - e. VOC and HAP contents of inks and glues used at the facility;
 - f. Monthly and consecutive 12-month totals of facility-wide VOC emissions;
 - g. Monthly and consecutive 12-month totals of facility-wide individual and combined HAP emissions.[Rule 62-4.070(3), F.A.C., Permit 0951333-001-AC]

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.]

16. Fuel Sulfur Content Records. The permittee shall maintain records to document that the liquid fuel sulfur content is less than 0.5% by weight, for each shipment of fuel oil. [Rule 62-4.070(3), F.A.C, 40 CFR Part 60 Subpart Dc section 60.48c(f)(1)]
17. 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.]

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CITATION FORMATS

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

Old Permit Numbers

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

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

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

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number for that county
“001” identifies the specific permit project number
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor source federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

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

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

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System (DEP database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

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

SECTION 4. APPENDIX B

General Conditions

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

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

SECTION 4. APPENDIX B

General Conditions

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

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

SECTION 4. APPENDIX C

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emission 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.]
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.]

SECTION 4. APPENDIX C

Common Conditions

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 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

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Common Conditions

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 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

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Common Conditions

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.]

SECTION 4. APPENDIX D
Common Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units at the facility.

COMPLIANCE TESTING REQUIREMENTS

1. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62-297.310(2), F.A.C.]
2. Applicable Test Procedures - Opacity Compliance Tests: When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time;
 - b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard;
 - c. The minimum observation period for opacity tests conducted by employees or agents of EPD to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
[Rule 62-297.310(4), F.A.C.]
3. Determination of Process Variables:
 - a. *Required Equipment*. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards;
 - b. *Accuracy of Equipment*. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5), F.A.C.]
4. Frequency of Compliance Tests: The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
 - a. *General Compliance Testing*.
 1. The owner or operator of a new or modified emissions unit that is subject to an emission

SECTION 4. APPENDIX D
Common Testing Requirements

- limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.
2. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit.
 3. The owner or operator shall notify EPD, 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 for the owner or operator.
- b. *Special Compliance Tests.* When EPD, 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 an FDEP rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to EPD.

[Rule 62-297.310(7), F.A.C.]

RECORDS AND REPORTS

5. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with EPD on the results of each such test. The required test report shall be filed with EPD as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow EPD to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report shall provide the following information.
 - a. The type, location, and designation of the emissions unit tested;
 - b. The facility at which the emissions unit is located;
 - c. The owner or operator of the emissions unit;
 - d. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run;
 - e. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - f. The date, starting time and end time of the observation;
 - g. The test procedures used;
 - h. The names of individuals who furnished the process variable data, conducted the test, and prepared the report;
 - i. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure;
 - j. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

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