Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

DRAFT PERMIT

PERMITTEE

Melitta USA, Inc.
13925 58th Street North
Clearwater, FL 33760

Authorized Representative:
Mr. Matthias Bloedorn, Director of Paper Manufacturing, Paper Operations

Air Permit No. 1030543-001-AC
Permit Expires: 01/15/2012
Site Name : Melitta USA, Inc.
Minor Air Construction Permit
Project Name: Coffee Filter Manufacturing Facility

This is the final air construction permit, which authorizes the after-the-fact construction of a coffee filter manufacturing facility. It is also for the construction of a flexographic printing press. The work is conducted at the Melitta USA, Inc. (Standard Industrial Classification No. 2676). The facility is located in Pinellas County at 13925 58th Street North in Clearwater, Florida. The UTM coordinates are Zone 17, 331.58 km East, and 3087.13 km North. As noted in the Final Determination provided with this final permit, no changes 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 and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

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.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. 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 Hillsborough County, Florida
DRAFT

_____ _____

Mara Grace Nasca Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Matthias Bloedorn, Director of Paper Manufacturing, Paper Operation
Melitta, USA, Inc.
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Clerk Stamp

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

DRAFT

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Project Description and Proposed Emission Units

This facility manufactures coffee filters. This project will create the following emissions units.

Facility ID No. 1050543	
ID No.	Emission Unit Description
001	Coffee Filter Manufacturing
002	Flexographic Printing

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

Exempt Emission Units/Activities

One custom made cyclone dust collector that receives emissions through the suction ventilation system that runs underground from a funnel shaped entry point at each of the partially enclosed coffee filter machines to the cyclone. The cyclone vents inside the boiler room.
Rule 62-4.040, F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (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 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

PERMIT HISTORY/AFFECTED PERMITS

This is the initial construction permit for this facility.

ADMINISTRATIVE

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

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

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

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
300 South Garden Avenue
Clearwater, FL 33756
Telephone: 727-464-4422

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

a. Appendix A. Citation Formats and Glossary of Common Terms;
b. Appendix B. General Conditions;
c. Appendix C. Common Conditions; and
d. Appendix D. Common Testing Requirements.

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

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

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control

device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

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

8. Application for Non-Title V Air Operation Permit - This permit authorizes construction or modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions units. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of the flexographic printer. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

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

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

c. copies of the most recent two months of records/logs specified in Specific Condition No(s). A.2. and B.2.

The application shall be submitted to the Permitting Authority with a copy to the Pinellas County Air Quality Division (Compliance Authority).

[Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

FACILITY WIDE

9. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 ("Potential to Emit"), F.A.C.]

10. 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. and Pinellas County Code, Section 58-178]

11. Documentation - Supporting documentation (e.g., MSD sheets, "As Supplied" sheets, "As Applied" sheets, purchase orders, inventory records, production records, etc.) for the records required by Specific Condition Nos. A.2. and B.2. which include sufficient information to determine VOC and HAP emissions, shall also be kept. At the permittee's option, "quantity received" may be reported to satisfy the requirement of "quantity used".
[Rule 62-4.070(3), F.A.C.]

12. Records Retention - The monthly logs required by Specific Condition Nos. A. 2. and B.2. shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department and the Pinellas County Air Quality Division upon request
[Rule 62-4.070(3), F.A.C.]

A. EU No. 001 Coffee Filter Manufacturing

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Paper comes into the facility in large rolls. Eight custom-built coffee filter machines are used to form cone shaped coffee filters from the rolls of paper. The paper is unwound from the large rolls, perforated, then cut into two tracks and folded over. The sides of the coffee filters are fused together in a crimping process using a rotating die. To prevent the paper from sticking to the rotating die, solvent is applied as a mist. VOC and HAP emissions from the use of solvent are emitted to the atmosphere. Following the crimping process, the filters are cut out of the web, collated and packaged for distribution. Each machine is partially enclosed and has a funnel shaped entry point to a suction ventilation system that pulls from the entry point and runs underground to the exempt cyclone in the boiler room. Particulate emissions are vented from the cyclone into the room.

EMISSIONS STANDARDS

A.1. VOC and HAP Emission Limitations - Emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs), as defined in Rule 62-210.200, F.A.C., shall not exceed the following:

Pollutant	Emission Limits (tons/consecutive 12 month period)
Volatile Organic Compounds	49.3
Total Hazardous Air Pollutants	2.5

Permitting Note: These emission limits are based on an annual usage of 15,000 gallons of the solvent Melitta "KD" Blend with a VOC content of 92.8% and a HAP content of 4.7%.

[Rule 62-210.200, F.A.C. ("Potential to Emit"); as requested in Construction Permit application received 11/08/2010]

RECORDS AND REPORTS

A.2. VOC and HAP Recordkeeping - In order to document compliance with the VOC and HAP emission limits in Specific Condition No. A.2., the permittee shall maintain monthly records. The records shall contain, at a minimum, the following:

a. facility name, facility ID No., emission unit ID No., and description (i.e., Melitta USA, Inc., 1030543, EU 001, Coffee Filter Manufacturing);

b. total quantity (gallons) and VOC and HAP content (lbs/gallon) of all VOC and HAP containing materials used during the month;

A.2. *(continued)*

c. calculated monthly total VOC and HAP emissions, in pounds or tons per month (based on b. above); and

d. cumulative total of all VOC and HAP emissions for the most recent consecutive 12 month period (tons per consecutive 12 month period).

[Rule 62-4.070(3), F.A.C.]

B. EU No. 002 Flexographic Printing

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
002	One Kabey-synchro flexographic printing machine is used to print the company name on the filter paper before it enters the coffee filter machines to be cut and crimped. VOC emissions are emitted to the atmosphere.

PERFORMANCE RESTRICTIONS

B.1. VOC/HAP Emission Limitations –

a. Emissions of volatile organic compounds (VOCs), as defined in Rule 62-210.200, F.A.C., shall not exceed the following:

Pollutant	Emission Limits (tons/consecutive 12 month period)
Volatile Organic Compounds	2.4

b. The printing operation shall not use any ink that contains any hazardous air pollutant (HAP).

Permitting Note: This emission limit is based on an annual usage of 750 gallons of CSL39513 Brown Ink R with a VOC content of 77.0%. The ink contains no HAPS.

[Rule 62-210.200, F.A.C. ("Potential to Emit"); as requested in Construction Permit application received 11/08/2010]

NOTIFICATION REQUIREMENTS

B.2. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of EU No. 002, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., ("Commence Operation")]

RECORDS AND REPORTS

B.3. VOC Recordkeeping - In order to document compliance with the VOC emission limits in Specific Condition No. B.1., the permittee shall maintain monthly records. The records shall contain, at a minimum, the following:

a. facility name, facility ID No., emission unit ID No., and description (i.e., Melitta USA, Inc., 1030543, EU 002, Flexographic Printing);

b. total quantity (gallons) and VOC content (lbs/gallon) of all VOC containing materials used during the month;

c. calculated monthly total VOC emissions, in pounds or tons per month (based on b. above); and

d. cumulative total of all VOC emissions for the most recent consecutive 12 month period (tons per consecutive 12 month period).

[Rule 62-4.070(3), F.A.C.]