TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Sofidel America, Inc.
1006 Marley Drive
Haines City, FL 33844-8464

Sofidel America, Inc. - Haines City Operation

Facility ID No. 1050380

PROJECT

Project No. 1050380-008-AC
Application for Minor Air Construction Permit
Project Name: Construction of a boiler and two cogeneration plants

COUNTY

Polk County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-0926

December 31, 2013

Prepared by Amanda Tucker

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

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

I. Facility Description:

Sofidel America, Inc. – Haines City Operation manufactures paper tissue and paper towel final products by taking pre-made (off-site) or produced on-site jumbo rolls of tissue and towel and converting them into smaller rolls, wrapping them in plastic or paper wrap, and packaging them in boxes.

II. Project Description:

A. Applicant:

Tony Curtis, CEO
Sofidel America, Inc.
1006 Marley Drive, Haines City, FL 33844-8464

B. Professional Engineer:

Cory A. Houchin, P.E.
Environmental Sciences Group
P.O. Box 7495, Tampa, FL 33673

C. Project Location:

Sofidel America, Inc. – Haines City Operation
1006 Marley Drive, Haines City, FL 33844-8464

D. Project Summary:

This project is to construct a natural gas fired boiler, two natural gas fired engines with heat recovery steam generators (HRSG)/Economizer cogeneration plants and to reduce total gas usages from the paper tissue production lines duct heaters E.U.Nos. 002 and 005. The existing Thermogenics 600 HP boiler

(E.U. 001) will be removed from the site. The existing Hurst 980 HP boiler (E.U. 004) will now be used as a backup boiler. This project will create the emissions unit Nos. 007, 008 and 009 and will modify the emissions unit Nos. 002, 004 and 005.

E. Application Information:

Application Received on: 11/05/2013
Additional Information Requested on: 11/20/2013
Additional Information Received on:12/04/2013
Application Complete on: 12/04/2013

III. Applicable State and Federal Regulations

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	N	there is no applicable source category
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	EU Nos. 003, 006, 007 & 008 are a source of VOC
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	Y	EU Nos. 004 & 009 are subject to 62-296.406, F.A.C. – Fossil fuel steam generators with less than 250 MMBtu/hr heat input
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Polk County is not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	this is a new source, therefore not subject to PM RACT rule
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	Y	EU. Nos. 004 & 009 are subject to 40 CFR 60, Subpart Dc. EU Nos. 007 & 008 are subject to 40 CFR 60, Subpart JJJJ.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	Y	EU Nos. 007 & 008 are subject to 40 CFR 63, Subpart ZZZZ. Compliance with 40 CFR 60, Subpart JJJJ satisfies its compliance requirements.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source

Subject to:	Y/N	Comments
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE testing is required for EU Nos. 004 & 009. NOx, CO & VOC testing for EU Nos. 007 & 008

IV. Summary of Emissions

Pollutant	**EU No. and brief description**	**Potential Emissions** (tpy)	**Allowable Emissions** (tpy, opacity)
VOC	002	0.73	0.58
	003	21.0*	21.0*
	004	0.99	0.99
	005	0.73	0.58
	006		
	007	20.41	6.12
	008	20.41	6.12
	009	0.51	0.51
	Total	**63.8**	**34.9**
NOx	002	13.22	10.63
	004	17.95**	17.95**
	005	13.22	10.63
	007	34.86	34.86
	008	34.86	34.86
	009	4.60	4.60
	Total	**100.76**	**95.58**
CO	002	11.11	8.93
	004	15.07	15.07
	005	11.11	8.93
	007	54.84	5.48
	008	54.84	5.48
	009	7.73	7.73
	Total	**139.76**	**36.55**
SO_2	002	0.079	0.064
	004	0.11	0.11
	005	0.079	0.064
	007	0.10	0.10
	008	0.10	0.10
	009	0.06	0.06
	Total	**0.42**	**0.39**
PM	002	1.01	0.81
	004	1.365	1.365
	005	1.01	0.81
	007	0.01	0.01
	008	0.01	0.01
	009	0.70	0.70

Pollutant	**EU No. and brief description**	**Potential Emissions** (tpy)	**Allowable Emissions** (tpy, opacity)
	Total	**2.74**	**2.34**
VE Limitation			
VE	004, 009		20%

{Notes: *1. VOC emissions of 21 tpy is combined from the EU Nos. 003 & 006.
**2. Emissions from 980 HP Boiler (EU 004) is not counted since it will operate only as a backup to the engines E.U. Nos. 007 & 008)}

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).