

## Dibble, Dickson

---

**From:** Betty.Hill@ocfl.net  
**Sent:** Friday, May 14, 2010 12:53 PM  
**To:** Dibble, Dickson; CarmenBugay@templeinland.com  
**Cc:** Jodi.Dittell@ocfl.net; David.Jones2@ocfl.net; Darrell.Lobin@ocfl.net; John.Kasper@ocfl.net  
**Subject:** Temple Inland - Air Permitting Rqmts - ltr dtd 051310-pdf.pdf  
**Attachments:** Temple Inland - Air Permitting Rqmts - ltr dtd 051310-pdf.pdf

<<Temple Inland - Air Permitting Rqmts - ltr dtd 051310-pdf.pdf>>

The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

Orange County EPD is issuing electronic documents for permits, notices and other correspondence, to provide greater service to the applicant and the engineering community. In addition, the original will be sent to the applicant via US certified mail. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

When email addresses are not available, a copy of the document will be mailed.

If you have any questions, please contact John Kasper at 407-836-1400.

Thank you,

Betty Hill  
Air Quality Management Section  
Orange County Environmental Protection Division  
800 Mercy Drive, Suite 4  
Orlando, FL 32808  
407-836-1400



---

PLEASE NOTE: Florida has a very broad public records law (F. S. 119). All e-mails to and from County Officials are kept as a public record. Your e-mail communications, including your e-mail address may be disclosed to the public and media at any time.



ENVIRONMENTAL PROTECTION DIVISION

Lori Cunniff, Manager  
800 Mercy Drive, Suite 4  
Orlando, Florida 32808-7896  
407-836-1400 • Fax 407-836-1499  
www.ocepd.org

May 13, 2010

Mr. William Adams  
Administrative Logistics Manager  
Temple-Inland  
711 East Lancaster Road  
Orlando, Florida 32809

**CERTIFIED MAIL: 7008 0150 0003 5918 5750**

**Subject: Air Permitting Requirements  
Temple-Inland Orlando Facility**

Dear Mr. Adams:

On April 29, 2009, Darrell Lobin and John Kasper of the Orange County Environmental Protection Division (EPD) visited your facility to discuss permitting requirements as requested by Ms. Carmen Bugay. They discussed information provided by your staff and the permitting requirements of the Florida Administrative Code (F.A.C.), and toured your facility. Afterwards, EPD staff reviewed your facility configuration, permitting requirements and applicable regulations, and information in the Air Resources Management System (ARMS) database of the Florida Department of Environmental Protection (FDEP). The EPD's observations, interpretation of permitting requirements and conclusions are presented below.

1. Facility Information

The current facility has been operational since the 1950's and ARMS has no record of a previous air permit. The facility currently has one corn starch storage silo with one bin vent dust collector, one cyclone that controls a scrap cardboard recovery system, four flexographic printing presses and one 14.3 MMBTU/hr boiler fired by natural gas (primary fuel) and diesel (backup fuel). The four flexographic presses are one Langston, one EVOL, one Martin DRO and one Ward. The facility plans to remove the Ward press and replace the Langston press with another Langston press.

2. Prior Exemption from Air Permitting

The facility supplied EPD with an exemption letter from FDEP Central District dated January 15, 1999. This exemption letter addressed the starch silo, a boiler and a surface coating operation. The letter considered all three sources exempt from air permitting. The facility changed boilers in 2001 and installed one with a maximum heat input of 14.3 MMBTU/hr which the facility considered exempt.

3. Starch Silo

The FDEP Central District considered the starch silo exempted by Rule 62-210.300(3)(b)2., F.A.C. Temple-Inland told EPD that the silo holds corn starch with

May 13, 2010

Mr. William Adams, Administrative Logistics Manager

Temple-Inland

Page 2 of 3

an estimated silo throughput of about 200,000 to 300,000 lb/month or 1200-1800 tons per year (TPY). This silo is pneumatically loaded, and the dust is controlled with a bin vent dust collector. The dust collector is required during silo loading to meet the general limit for visible emissions of less than 20% opacity (Rule 62-296.320(4)(b)1., F.A.C.). The EPD considers the silo and dust collector as a regulated (non-exempt) emission unit to provide assurance that the dust collector is operating properly.

4. Boiler

The EPD may consider a boiler of 14.3 MMBTU/hr heat input exempt from air permitting if it operated on natural gas only. If the facility wants to use the diesel fuel backup, the boiler is subject to 40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. This boiler's use of diesel fuel would also be 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 imposes visible emission limits and requires best available control technology (BACT) for particulate matter and sulfur dioxide. These are unit specific applicable requirements that are not allowed for exempt sources by Rule 62-210.300(3)(a)34., F.A.C. The EPD considers this dual-fuel capable boiler a regulated (non-exempt) emission unit.

5. Surface Coating or Printing Operation

A surface coating operation is addressed in the exemption, but EPD observed a flexographic printing operation. The facility describes the presses as a flexographic printing operation. Exemptions for printing operations are addressed in Rule 62-210.300(3)(a)37., F.A.C., which limits a facility to 80,000 lb/yr of ink for a flexographic printing operation. The facility calculates potential VOC emissions of approximately 80 TPY (160,000 lb/yr). Therefore, the printing operation is not exempt from permitting.

6. Scrap Recovery System with Cyclone

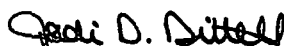
Scrap cardboard from the manufacturing process is swept up by air currents into ducts and routed to a large cyclone which separates the scrap from the air. The cyclone exhausts to the atmosphere and thus EPD consider the cyclone to be air pollution control equipment and not manufacturing process equipment. The scrap is bundled and shipped off-site for reprocessing, in quantities greater than 5 TPY. Potential emissions (without the cyclone) exceed the emission unit PM exemption limit of Rule 62-210.300(3)(b)1., F.A.C. The EPD considers the cyclone emission control equipment subject to air permitting.

In summary, your facility has four regulated emission units that are not exempt from air permitting: the starch silo with dust collector, the dual-fueled boiler, the flexographic printing operation and the scrap recovery system with cyclone. Your facility is not eligible for an air general permit because Rule 62-210.310(1)(a)1., F.A.C., requires a general permit facility to have no more than one regulated emission unit. Your facility


May 13, 2010  
Mr. William Adams, Administrative Logistics Manager  
Temple-Inland  
Page 3 of 3

must apply to EPD for an air construction permit for these four emission units. If you have any questions or comments, please contact the project engineer, John Kasper, at the letterhead address or e-mail at [John.Kasper@ocfl.net](mailto:John.Kasper@ocfl.net).

Sincerely,



Jodi D. Dittell  
Environmental Program Supervisor  
Air Quality Management  
Orange County Environmental Protection Division

  
(4)JK/JD:bh

Cc: Carmen Bugay, Environmental Manager, Corrugated Packaging, Temple-Inland  
David Jones, Environmental Program Administrator, EPD  
Dickson Dibble, Bureau of Air Regulation, FDEP Tallahassee