



OPERATING PERMIT (Conditional Major) Issued Pursuant to Tennessee Air Quality Act

Date Issued: March 21, 2013

Permit Number:

Date Amended: **AUG 22 2013** AMENDMENT

466831

Date Expires: May 1, 2022

Issued To:

International Paper (Morristown Container)

Installation Address:

5032 S. Davy Crockett Parkway
Morristown

Installation Description:

Source 01: One (1) 200 hp Low Pressure Boiler and
One (1) 750 hp High Pressure Boiler

Source 10: Corrugated Container Manufacturing
and Flexographic Printing Operation

Emission Source Reference No.

32-0028

NSPS as Indicated

MACT JJJJJ

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations.

GENERAL CONDITION:

1. The application that was utilized in the preparation of this permit is dated December 19, 2012, and signed by Mike Thompson, General Manager for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

(conditions continued on next page)

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

NON-TRANSFERABLE

POST AT INSTALLATION ADDRESS

CN-0827 (Rev. 9-92)

RDA-1298

SECTION I: The following conditions shall apply to all sections of this permit unless otherwise noted.

2. The permittee has elected to opt-out of being issued a major source operating permit pursuant to Division Rule 1200-03-09-.02(11)(a). The permittee would be considered a major source because their "potential to emit" value for volatile organic compounds (VOC) was greater than 100 tons per year, for a single hazardous air pollutant (HAP) was greater than 10 tons per year, and for a combination of hazardous air pollutants (HAPs) was greater than 25 tons per year at the time of application. The permittee has agreed to be subject to limitations in order to be below the major source applicability thresholds for VOC of 100 tons per year, for a single HAP of 10 tons per year, and for a combination of HAPs of 25 tons per year.
3. Any non-compliance with any condition(s) of this permit set to restrain the "potential to emit" below the applicability thresholds of 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations shall be reported in writing to the Technical Secretary within three (3) working days of such discovery. This notification, at a minimum, shall include the identification of the source, identification of the permit condition(s) violated, and details of the violation.
4. Volatile organic compounds (VOC) emitted from this facility shall not exceed 10.0 tons during any month of operation and 98.9 tons during any period of twelve consecutive months. VOC emissions from the Boilers and Starch Silo have the potential to emit no more than 0.96 tons per year. In order to avoid the necessity of keeping VOC emission records for these sources, 0.96 tons per year will be added to the facility-wide 12 consecutive month VOC emission total.

This emission limitation is established pursuant to Rule 1200-03-09-.02(11)(a) of the Tennessee Air Pollution Control Regulations and the information contained in the application dated December 12, 2002 from the permittee. The permittee has requested this limit in order to avoid Title V status.

5. The maximum emission rate from the entire facility for any single hazardous air pollutant (HAP), listed pursuant to Section 112(b) of the Federal Act, shall not exceed 9.9 tons per year. Total emissions of all HAPs from the entire facility shall not exceed 24.9 tons per year. In the event that the emission rates from the entire facility exceed these limits, the permittee shall provide written notification of the exceedance(s) to the Technical Secretary within fifteen (15) days from the date of discovery.
6. The as-supplied VOC content of all VOC-containing materials to be used by this facility shall be determined as follows:

All Coatings, Inks, Adhesives, Thinners, and Solvents - from Material Safety Data Sheets (MSDS) or manufacturer or vendor formulation data which explicitly list the VOC content by weight.

The results of these determinations shall be compiled in the following tabular format or an alternative format which readily provides the same required information. This table, along with MSDS or other supporting documentation for each material used, shall be maintained at the source location and made available for inspection by the Technical Secretary or his representative, beginning 180 days from the issue date of this permit. If new materials are used, or if material formulation is changed, the table shall be updated within 90 days from the initial date of usage of the new or altered material. TAPCR 1200-03-10-.02(2)(a).

| Process Material | Material Density (lb/gal) | VOC Content (lb/gal) | HAP Content (lb/gal) |
|------------------|------------------------------|-------------------------|-------------------------|
| Material (1) | | | |
| Material (2) | | | |
| etc. | | | |

7. The permittee shall calculate the actual quantities of VOC and HAPs emitted from this facility during each calendar month and maintain records of these emissions in a form that readily shows compliance with **Conditions 4 and 5** of this permit (see example below). This log must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. For monthly logs all data, including all required calculations, must be entered in the log no later than thirty (30) days from the end of the month for which the data is required. This log must be retained for a period of not less than five (5) years. TAPCR 1200-03-10-.02(2)(a).

(conditions continued on next page)

[illegible]

LOG 2-YEARLY LOG

[illegible]

9. This permit supersedes all previously issued permits for this facility. TAPCR 1200-03-09-.03(6).
10. The permittee shall apply for renewal of this permit not less than sixty (60) days prior to the permit expiration date, pursuant to Rule 1200-03-09-.02(3) of the Tennessee Air Pollution Control Regulations.

SECTION II: SOURCE SPECIFIC CONDITIONS

| | |
|------------|--|
| 32-0028-01 | One (1) 200 hp Low Pressure Boiler and One (1) 750 hp High Pressure Boiler (30.7 MMBtu/hr Rated Input Capacity, NSPS), Natural Gas-Fired with Number 2 Fuel Oil Backup |
|------------|--|

11. The 750 hp high pressure boiler located at this facility is subject to the Federal New Source Performance Standard (NSPS) specified in subpart Dc of 40 CFR 60. TAPCR 1200-03-09-.02(6) and the application dated December 19, 2012.
12. The total maximum heat input capacity for this fuel-burning source shall not exceed 38.9 million Btu per hour (MMBtu/hr), on a daily average basis. TAPCR 1200-03-09-.02(6) and the application dated December 19, 2012.

(conditions continued on next page)

13. Particulate matter (TSP) emitted from this source shall not exceed 10.9 pounds per hour (lb/hr). TAPCR 1200-03-06-.02.
14. Nitrogen oxides (NO_x) emitted from this source shall not exceed 5.8 lb/hr and 25.2 tons during any period of twelve consecutive months. TAPCR 1200-03-06-.03(2).
15. Carbon Monoxide (CO) emitted from this source shall not exceed 3.3 lb/hr and 14.3 tons during any period of twelve consecutive months. TAPCR 1200-03-06-.03(2).
16. Sulfur dioxide emitted from this source shall not exceed 18.4 lb/hr and 75.1 tons during any period of twelve consecutive months.

This emission limitation is established pursuant to Rule 1200-03-14-.01(3) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated November 8, 1996, from the permittee. The permittee has requested this limit in order to reduce annual emission fees. Compliance with this condition shall be assured by compliance with **Conditions 17, 18, 19, and 22**.

17. Only natural gas or Number 2 fuel oil shall be used as fuel(s) for this source. TAPCR 1200-03-09-.02(6) and the application dated December 19, 2012.
18. The total Number 2 fuel oil usage for this source shall not exceed 1,100,000 gallons during any period of twelve consecutive months. TAPCR 1200-03-09-.02(6) and the application dated December 19, 2012.
19. The sulfur content of the Number 2 fuel oil shall not exceed 0.5 percent by weight. TAPCR 1200-03-09-.02(6) and the application dated December 19, 2012.
20. The permittee shall demonstrate compliance with **Condition 19** by obtaining a fuel supplier certification for each shipment of Number 2 fuel oil. The certification shall contain the name of the oil supplier and a statement from the supplier that the fuel oil complies with the specifications for Number 2 fuel oil, as defined by the American Society for Testing and Materials (ASTM). All fuel supplier certifications must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. These fuel supplier certifications must be retained for a period of not less than 5 years. TAPCR 1200-03-09-.02(6) and the application dated December 19, 2012.
21. A report stating the compliance status of this facility with **Condition 20** shall be submitted for each six month period (January 1 through June 30 and July 1 through December 31) during which Number 2 fuel oil was burned by the 750-hp (NSPS) boiler. This report shall be postmarked by the 30th day following the end of the reporting period and shall cover the preceding six-month reporting period. The permittee shall not be required to submit this report for any reporting period during which Number 2 fuel oil was not burned.

The report shall include the following information:

- a) Records of fuel supplier certification required by **Condition 20**.
- b) The report shall include a certified statement signed by the owner or operator of the facility that the records of fuel supplier certifications submitted represent all of the fuel oil combusted during the reporting period.

The report shall be submitted to the Knoxville Environmental Field Office at the following address:

Air Pollution Control Field Office Manager
Knoxville Environmental Field Office
3711 Middlebrook Pike
Knoxville, TN 37921

TAPCR 1200-03-10-.02(2)(a).

22. For each boiler, a monthly log of the natural gas and/or fuel oil usage must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. These logs must be maintained in a form which readily shows compliance with **Conditions 17 and 18**. All data, including all required calculations, must be entered in the log no later than thirty (30) days from the end of the month for which the data is required. This log must be retained for a period of not less than five (5) years. TAPCR 1200-03-10-.02(2)(a).

This recordkeeping requirement is established pursuant to 40 CFR §60.48c(g). The recordkeeping requirement of 60.48c(g) is altered according to the March 7, 2002, guidance to the agency from the EPA, which allows for monthly rather than daily recording of natural gas and Number 2 fuel oil use in this boiler.

23. Visible emissions from this source shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period, and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1)
24. Pursuant to §63.11195(e), gas-fired boilers are exempt from the requirements of 40 CFR 63 Subpart JJJJJ (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources). Only natural gas shall be used as a primary fuel for this source. Diesel fuel shall be used only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel (diesel fuel) shall not exceed a combined total of 48 hours during any calendar year. TAPCR 1200-03-09-.01(1)(d) and the letter dated July 24, 2013. TAPCR 1200-03-09-.03(8), §63.11195(e), and §63.11237.

32-0028-10 Corrugated Container Manufacturing and Flexographic Printing Operation

This source includes the following previously permitted emission sources:

| Source Number | Description |
|---------------|--|
| 32-0028-03 | Waste Paper Collection Cyclone |
| 32-0028-04 | Waste Paper Collection Cyclone |
| 32-0028-05 | Two (2) 86" Three-Color Printer Slotters |
| 32-0028-07 | One (1) 66" Two-Color Printer Slotter |
| 32-0028-09 | One (1) Two-Color Die Cutter |
| 32-0028-10 | Two (2) Jumbo Folder Gluers |

Note: emission source 32-0028-08 (two-color flexo folder gluer) was removed from this table by Amendment #1.

25. Particulate matter (TSP) emitted from this source shall not exceed 16.1 pounds per hour (lb/hr). TAPCR 1200-03-07-.02(4).
26. Visible emissions from Roof Vents (RVs) or any building opening shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period, and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1)).
27. Fugitive emissions from this source shall be controlled as specified in Rule 1200-03-08-.01. Specifically, no person shall cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20. Fugitive emissions from this source shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

(end of conditions)

Amendment: The permit was amended to remove the oil-fired boiler MACT requirements (conditions 24-30) by agreeing to the requirements listed in §63.11237, in accordance with the permittee request dated July 24, 2013.