



**STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE**

PERMIT TO CONSTRUCT / MODIFY AND OPERATE AIR CONTAMINANT SOURCE(S)

Permit Number: 479994

Facility (Permittee): International Paper Company dba Morristown Container

Facility ID: 32-0028

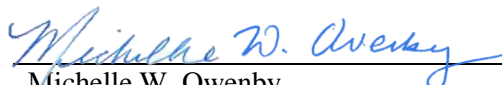
Facility Address: 5032 S. Davy Crockett Parkway, Morristown
Hamblen County

Facility Classification: Conditional Major

Federal Requirements: 40 CFR 60 subpart Dc

Facility Description: Fiber based packaging, pulp, and paper manufacturer

Conditional Major Permit 479994, consisting of 27 pages is hereby issued February 17, 2023, pursuant to the Tennessee Air Quality Act and by the Technical Secretary, Tennessee Air Pollution Control Board, Department of Environment and Conservation. This permit expires on May 1, 2032. 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 (TAPCR).



Michelle W. Owenby
Technical Secretary
Tennessee Air Pollution Control Board

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.

Section I – Sources Included in this Permit

FACILITY DESCRIPTION			
Source Number	Source Description	Status	Control Device/Equipment
01	One 750 hp High Pressure Boiler	Existing	None
10	Corrugated Container Manufacturing and Flexographic Printing Operation	Existing	None
11	Jumbo Flexo Folder	New	None

Section II – Permit Record

Permit Type	Description of Permit Action	Issue Date
Combined	Combined Construction/operating permit	June 21, 2022
Amendment 1	Amended permit to add changes from construction permit 979323 adding source 11	February 17, 2023

Section III - General Permit Conditions

G1. Responsible Person

The applications that were utilized in the preparation of this permit are dated December 22, 2021 and February 2, 2022 and are signed by Mike Thompson, General Manager, the Responsible Person for the permittee. The Responsible Person may be the owner, president, vice-president, general partner, plant manager, environmental/health/safety coordinator, or other person that is able to represent and bind the facility in environmental permitting affairs. If this Responsible Person terminates their employment or is assigned different duties and is no longer the person to represent and bind the permittee in environmental permitting affairs, the new Responsible Person for the permittee shall notify the Technical Secretary of the change in writing. The Notification shall include the name and title of the new Responsible Person assigned by the permittee to represent and bind the permittee in environmental permitting affairs, and the date the new Responsible Person was assigned these duties.

Should a change in the Responsible Person occur, the new Responsible Person must submit the Notification provided in Appendix 1 of this permit no later than 30 days after being assigned as the Responsible Person. A separate notification shall be submitted for each subsequent change in Responsible Person.

TAPCR 1200-03-09-.03(8)

G2. Application and Agreement Letters

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application referenced in **Condition G1**, and any documented agreements made with the Technical Secretary.

TAPCR 1200-03-09-.01(1)(d), (Appendix 8)

G3. Submittals

Unless otherwise specified within this permit, the permittee shall submit, preferably via email and in Adobe Portable Document format (PDF), all applicable plans, checklists, certifications, notifications, test protocols, reports, and applications to the attention of the following Division Programs at the addresses indicated in the table below:

Permitting Program	Compliance Validation Program	Field Services Program
<ul style="list-style-type: none"> • Notifications • Startup certifications • Applications • NSPS reports • MACT/GACT/NESHAP reports • Emission Statements 	<ul style="list-style-type: none"> • Test protocols • Emission test reports • Visible emission evaluation reports 	<ul style="list-style-type: none"> • Semiannual reports • Annual compliance certifications/status report
Division of Air Pollution Control William R. Snodgrass TN Tower, 15 th Floor 312 Rosa L. Parks Avenue Nashville, TN 37243 Air.Pollution.Control@tn.gov		Knoxville Environmental Field Office Division of Air Pollution Control 3711 Middlebrook Pike Knoxville, TN 37921 APC.KnoxEFO@tn.gov

The permittee shall submit the information identified above as requested in this permit. In lieu of submitting this information to the email addresses above, the permittee may submit the information to the attention of the respective Division Programs at the mailing addresses listed above.

TAPCR 1200-03-09-.03(8)

G4. Notification of Changes

The permittee shall notify the Technical Secretary for any of the following changes to a permitted air contaminant source which would not be a modification requiring a new construction permit:

- change in air pollution control equipment that does not result in an increase or otherwise meet the definition of a modification
- change in stack height or diameter
- change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

The permittee must submit the Notification provided in Appendix 2 of this permit 30 days before the change is commenced.

TAPCR 1200-03-09-.02(7)

G5. Permit Transference

- This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location. The permittee must submit a construction permit application for a new source to the Permitting Program not less than 90 days prior to the estimated starting date of these events. If the new source will be subject to major New Source Review, the application must be submitted not less than 120 days in advance of the estimated starting date of these events.

TAPCR 1200-03-09-.03(6)(b)

- B. In the event an ownership change occurs at this facility, the new owner must submit the notification provided in Appendix 3 of this permit. The written notification must be submitted by the new owner to the Permitting Program no later than 30 days after the ownership change occurs. If the change in ownership results in a change in Responsible Person for the facility, notification of the change in Responsible Person must also be submitted, as specified in **Condition G1**.

TAPCR 1200-03-09-.03(6)(a) and (b) and 1200-03-09-.01(1)(b)

G6. Operating Permit Application Submittal

- A. The permittee shall apply for an operating permit renewal not less than 60 days prior to the permit's expiration date.

TAPCR 1200-03-09-.02(3)(a)

- B. Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in this permit, all provisions of the Tennessee Division of Air Pollution Control Regulations, and all provisions of the Tennessee Air Quality Act.

TAPCR 1200-03-09-.02(6)

G7. Startup Certification for New or Modified Source(s)

Not Applicable

G8. Fees

The air contaminant source(s) identified in this permit shall comply with the requirements for payment of applicable annual emission fees and annual conditional major review fees to the Tennessee Division of Air Pollution Control based on the Administrative Fees Schedule I provided in Appendix 5 of this permit. The fee must be paid to the Division in full by the first day of the month that the fee is due (determined from Appendix 5). (Note: not all facilities are required to pay annual emission fees)

TAPCR 1200-03-26-.02

G9. General Recordkeeping Requirements

- A. All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

For Daily Recordkeeping	For Weekly Recordkeeping	For Monthly Recordkeeping
No later than seven days from the end of the day for which the data is required.	No later than seven days from the end of the week for which the data is required.	No later than thirty days from the end of the month for which the data is required.

- B. The information contained in logs, records, and submittals required by this permit shall be kept at the facility's address, unless otherwise noted, and provided to the Technical Secretary or a Division representative upon request or as required in this permit. Computer-generated logs are acceptable. Compliance is assured by retaining the logs, records, and submittals specified in this permit for a period of not less than five years at the facility's address.

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

G10. Routine Maintenance Requirements

The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

Compliance Method: Records of all repair and maintenance activities required above shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years. The date each maintenance and repair activity began shall be entered in the log no later than seven days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than seven days after activity completion.

G11. Visible and Fugitive Emissions

- A. Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24-hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

Compliance Method: When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

- B. The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions shall include, but are not limited to, the following:
- (a) Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
 - (b) Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
 - (c) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 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 TAPCR 1200-03-20. A malfunction is defined as, any sudden and unavoidable failure of process equipment or for a process to operate in an abnormal and unusual manner. Failures that are caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

TAPCR 1200-03-08-.01(1) and 1200-03-08-.01(2)

Compliance Method: When required to demonstrate compliance, fugitive emissions shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

- C. Fugitive emissions from roads and parking areas shall not exhibit greater than 10% opacity.

TAPCR 1200-03-08-.03

Compliance Method: When required to demonstrate compliance, fugitive emissions from roads and parking areas shall be determined by utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and August 24, 1984.

G12. NSPS/NESHAP/MACT/GACT Standards

The following source(s) are subject to and shall comply with all applicable requirements of each NSPS/NESHAP/MACT/GACT standard as indicated in the table below, including the General Provisions identified in Appendix 10. The applicable requirements of each standard are incorporated into this permit pursuant to TAPCR 1200-03-09-.03(8).

Source	NESHAP/MACT/GACT	NSPS
01		40 CFR 60 Subpart Dc

TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance methods are provided in the conditions in **Section VI** of this permit.

G13. VOC and NO_x Emission Statement

Not Applicable

G14. Facility-wide Limitations (Other Than Conditional Major)

Not Applicable

G15. Permit Supersedes Statement

This permit supersedes all previously issued permits for this/these source(s).

TAPCR 1200-03-09-.03(8)

G16. Source Testing Requirements

Not Applicable

Section IV – Conditional Major Conditions

C1. Major Source Opt-Out Requirements

The permittee has elected to opt-out of being issued a major source operating permit pursuant to TAPCR 1200-03-09-.02(11)(a). The permittee would be considered a major source because their potential to emit value(s) for Volatile Organic Compounds (VOCs), Sulfur Dioxide (SO₂), a single Hazardous Air Pollutant (HAP), a combination of Hazardous Air Pollutants (HAPs) was greater than 100 tons per year / 10 tons per year / 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 threshold for VOC and SO₂ of 100 tons per year and for single and combined HAPs of 10 and 25 tons per year.

TAPCR 1200-03-09-.02(11)(a)

C2. Notification of Non-Compliance

Any non-compliance with any condition(s) of this permit set to restrain the potential to emit below the applicability threshold(s) of 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations, shall be reported in writing to the Technical Secretary within 15 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.

TAPCR 1200-03-09-.03(8) and 1200-03-09-.02(11)(a)

C3. Failure to Abide by Conditional Major Emission Limit(s)

The permittee is placed on notice that **Condition C4**, of this permit contain(s) limitations that allow the permittee to opt-out of the major source operating permit program requirements specified in paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations. Failure to abide by these limits will not only subject the permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of federal enforcement action by the United States Environmental Protection Agency and the loss of being federally recognized as a conditional major source.

TAPCR 1200-03-09-.02(11)(e)1(vi)(I)

C4. Conditional Major Emission Limit(s)

- A. Emissions from the entire facility shall not exceed the following federally enforceable maximum emission rate(s), including emissions from exempt and insignificant emission units:

Pollutant(s)	Maximum Emission Rate(s) (tons during any period of 12 consecutive months)
Volatile Organic Compounds (VOC)	98.9
Individual Hazardous Air Pollutants (listed pursuant to Section 112(b) of the Federal Act)	9.9
Combined Hazardous Air Pollutants	24.9
Sulfur Dioxide (SO ₂)	40

TAPCR 1200-03-09-.02(11)(a) and the permittee's agreement letter(s) dated June 5, 2020, and June 9 2022 (Appendix 8)

Compliance Method: The permittee shall calculate the actual quantities of VOC and HAPs emitted from this facility, including emissions from exempt and insignificant activities, during each calendar month and maintain records of these emissions. Calculations shall be maintained in a form that readily provides the information required in the example table in Appendix 9, or in an alternative format which provides the same information. This information includes monthly material usage, material density, and VOC and HAP content for all input materials (primers, coatings, inks, solvents, cleaning materials, etc.) used during all intervals of 12-consecutive months. This log must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. These records shall be retained in accordance with **Condition G9**.

The as supplied VOC and HAP content of all VOC and HAP containing materials used by all sources at this facility shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data, which explicitly list the VOC and HAP content by weight or weight percent.

The results of these determinations shall be compiled in the format provided in Appendix 9 or in an alternative format which readily provides the same required information. This table, along with SDS or other supporting documentation for each material used, shall be maintained at the source location in accordance with condition G9.

VOC emissions from the Boilers and Corrugator have the potential to emit no more than 4.3 tons per year. In order to avoid the necessity of keeping VOC emission records for the Boilers and Corrugator, 4.3 tons per year will be added to the facility-wide 12 consecutive month VOC emission total.

If the facility adds insignificant or exempt activities/emission units, the permittee shall provide notification to the Division of the change in facility VOC and/or HAP emissions at least 30 day prior to the installation of each insignificant activity/emission unit [TAPCR 1200-03-.04(4)(a)] or at least 30 days prior to the installation of each exempt air contaminant source [TAPCR 1200-03-09-.04(4)(b), (c), or (d)].

TAPCR 1200-03-09-.03(8)

B. The permittee shall not exceed the following federally enforceable maximum throughput limitation:

Source Number	Limitation with Units and Averaging Period
32-0028-01	1,100,000 gallons of fuel oil during any period of twelve consecutive months.

TAPCR 1200-03-09-.02(11)(a) and the permittee's agreement letter(s) dated June 9, 2022 (Appendix 8)

Compliance Method: The permittee shall assure compliance with the operating restriction by complying with **Conditions S1-1C and F1-1**.

C5. Annual Compliance Status Report

The permittee shall submit a written report stating the compliance status of this facility with permit **Condition C4** by March 31 of every year. The report shall cover the preceding calendar year and shall include the records required by **Condition C4**. The first report following the issuance of this report shall cover the following permits and reporting periods. The report must include the compliance certification statement included in Appendix 7. Reports submitted with unsigned certification statements will be deemed incomplete.

Permit Number	Reporting Period Begins	Reporting Period Ends
466831	January 1, 2022	June 20, 2022
479994	June 21, 2022	December 31, 2022

TAPCR 1200-03-09-.03(8), 1200-03-09-.02(11)(a), and 1200-03-10-.02(2)(a)

Section V – Federal and/or State Only Requirements

See Section VI – Source Specific Permit Conditions

Section VI - Source Specific Permit Conditions

Source Number	Source Description
01	One 750 hp High Pressure Boiler (45.381 MMBtu/hr Rated Input Capacity, NSPS), Natural Gas-Fired with Number 2 Fuel Oil Backup

S1-1. Input Limitation(s) or Statement(s) of Design

- A. The maximum heat capacity of the fuel burning source is 45.381 million BTU per hour (MMBtu/hr). This condition is a statement of the capacity for the source. Should the permittee need to modify the source in a manner that increases the capacity, a construction permit shall be applied for and received in accordance with TAPCR 1200-03-09-.01 prior to making the change.

TAPCR 1200-03-09-.03(8) and either the application dated August 31 , 2021

Compliance Method: The permittee shall maintain documentation to demonstrate the capacity of the source. Documentation may include, but is not limited to, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

- B. Only Natural gas or number 2 fuel oil shall be used as fuels for this source. The source is only capable of burning these fuels. Should the permittee need to modify the source to allow the use of a fuel other than natural gas or number 2 fuel oil, a construction permit shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 prior to making the change.

TAPCR 1200-03-08-.03(8) and the application dated August 31, 2021

Compliance Method: The permittee shall maintain documentation to demonstrate the types of fuel used by the source. Documentation shall include, but is not limited to , manufacturers specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

- C. The maximum amount of number 2 fuel oil used by the source shall not exceed 1,100,000 gallons during any period of 12 consecutive months.

Compliance method: The permittee shall maintain a log of the actual quantity of fuel used by the source. This log shall be maintained and kept available for inspection by the Technical Secretary or a Division representative in accordance with **Condition G9**. Conformance with this means that the boiler is not subject to 40 CFR 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.

TAPCR 1200 9.02 11(a) and the agreement letter dated June 9, 2022 (Appendix 8)

- D. The sulfur content of the number 2 fuel oil shall not exceed 0.5 percent by weight.

Compliance method: The permittee shall obtain 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 a Division Representative. These fuel supplier certifications must be retained for a period of not less than five years.

TAPCR 1200-03-09-.02(6)

S1-2. Production Limitation(s)

Not Applicable

S1-3. Operating Hour Limitation(s)

Not Applicable

S1-4. Emission Limitation(s)

- A. Particulate matter (PM) emitted from this source shall not exceed 11.73 lbs/hr on a daily average basis.

TAPCR 1200-03-06-.02(2)(a) and the application with date February 4, 2022

Compliance Method: Compliance with this emission limit is assured by compliance with **Condition S1-1** and the emission factors from AP-42 Chapter 1.4, tables 1.4-1 and 1.4-2

- B. Nitrogen oxides (NO_x) emitted from this source shall not exceed 20.76 tons during any period of twelve consecutive months.

TAPCR 1200-03-06-.03(2)

Compliance Method: Compliance with this emission limit is assured by compliance with **Condition S1-1** and the emission factors from AP-42 Chapter 1.4, tables 1.4-1 and 1.4-2

- C. Carbon Monoxide (CO) emitted from this source shall not exceed 19.1 tons during any period of twelve consecutive months.

TAPCR 1200-03-06-.03(2)

Compliance Method: Compliance with this emission limit is assured by compliance with **Condition S1-1** and the emission factors from AP-42 Chapter 1.4, tables 1.4-1 and 1.4-2

- D. Sulfur dioxide (SO₂) emitted from this source shall not exceed 23.01 lbs/hr on a daily average basis..

TAPCR 1200-03-14-.01(3) and the agreement letter dated June 9, 2022 (Appendix 8)

Compliance Method: Compliance with this condition shall be assured by compliance with **Conditions S1-1** and **F1-1** and the emission factors from AP-42 Chapter 1.4, tables 1.4-1 and 1.4-2.

S1-5. Source-Specific Visible Emissions Limitation(s)

Not Applicable

- F1-1.** Pursuant to 40 CFR §60.48c(g)(2), the permittee shall record and maintain records of the amount of each fuel combusted by the boiler during each calendar month.

TAPCR 1200-03-09-.03(8)

Compliance method: The permittee shall record the actual quantity of natural gas and number 2 fuel oil used per month by the boiler in a log, in the format below, or alternative format, which provides the same information. The log shall be retained in accordance with **Condition G9**.

Natural gas usage log for: Source # 01

Month and Year	Boiler Natural Gas Usage	Previous 11-month Total	12-Consecutive Month Total

Note: The tons per 12 consecutive month values are the sum of the natural gas usage in the 11 months preceding the month just completed + the natural gas in the month just completed. If data is not available for the 11 months preceding the initial use of the table, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6(2) represents 6 tons emitted in 2 months].

Source Number	Source Description
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 One 86" Three-Color Printer Slotter 32-0028-07 One 66" Two-Color Printer Slotter 32-0028-09 One Two-Color Die Cutter 32-0028-10 One Jumbo Folder Gluers

S10-1. Input Limitation(s) or Statement(s) of Design

Not Applicable

S10-2. Production Limitation(s)

Not Applicable

S10-3. Operating Hour Limitation(s)

Not Applicable

S10-4. Emission Limitation(s)

Particulate matter (PM) emitted from this source shall not exceed 16.1 lbs/hr on a daily average basis.

TAPCR 1200-03-07-.02(4) and the application with date December 22, 2021

Compliance Method: The permittee shall operate and maintain each cyclone to control PM emissions. The source shall not operate unless a cyclone is in operation and in good working condition (free from abrasion holes and plugging problems). Each cyclone shall be externally inspected weekly and recorded to assure that abrasion holes and plugging problem have not developed. The permittee shall initiate, as well as record, corrective action within 24 hours and complete, as well as record, corrective action as expediently as practical if the permittee finds that an abrasion hole and/or plugging problem has developed during an inspection of the cyclones.

Identification of any abrasion holes and/or plugging problems and corrective action(s) shall be noted in the weekly inspection records. Inspection records shall also include the initials of the person performing the inspection(s) and corrective action(s), along with the date, time, and any relevant comments. Weeks that the source is not in operation shall be noted. These records shall be retained in accordance with **Condition G9**.

S10-5. Source-Specific Visible Emissions Limitation(s)

Not Applicable

Source No	Source Description
11	Jumbo Flexo Folder

S11-1. Input Limitation(s) or Statement(s) of Design

Not Applicable

S11-2. Production Limitation(s)

Not Applicable

S11-3. Operating Hour Limitation(s)

Not Applicable

S11-4. Emission Limitation(s)

Not applicable

S11-5. Source-Specific Visible Emissions Limitation(s)

Not Applicable

(end of conditions)

The permit application gives the location of this source as 36.147747” Latitude and -83.277159” Longitude.

Appendix 1: Notification of Change in Responsible Person

Facility (Permittee): _____ International Paper dba Morristown Container _____

Facility ID: _____ 32-0028 _____

Former Responsible Person: _____
Name Title

New Responsible Person: _____
Name Title

Email

Date New Responsible Person was assigned this duty: _____

I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Appendix 2: Notification of Changes

Facility (Permittee): International Paper dba Morristown Container

Facility ID: 32-0028

Source Number: _____

	Control Equipment	Stack Height (Feet)	Stack Diameter (Feet)	Exit Velocity (Feet/Second)	Exit Temperature (°F)
Current					
Proposed					
Current					
Proposed					
Current					
Proposed					

Comments:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Appendix 3: Notification of Ownership Change

Facility (Permittee): International Paper dba Morristown Container (Previous Owner)

Facility ID: 32-0028

Facility (Permittee): _____ (New Owner)

Email Address: _____

Secretary of State Control Number: _____ [as registered with the TN Secretary of State]

Date of Ownership Change: _____

Comments:

As the responsible person for the new owner or operator of the above mentioned facility (permittee):

- I agree to not make any changes to the stationary source(s) that meet the definition of modification as defined in Division 1200-03 or Division 0400-30¹, and
- I agree to comply with the conditions contained in **the permits listed below**, Division 1200-03 and Division 0400-30 of the Tennessee Air Pollution Control Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

List all active permits issued to the facility for which the owner wishes to assume ownership:

The information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

¹ Appropriate application forms must be submitted prior to modification of the stationary source(s).

Appendix 4: Startup Certification

Not Applicable

Appendix 5: Fees

All minor and conditional major source annual emission fees are due and payable to the Division in full according to SCHEDULE I below². The county that a source is located in determines when the minor source annual emission fee is due. Fees are due the first day of the month listed. If a source is located on contiguous property in more than one county, the county appearing earliest in the calendar year shall be used to determine the due date of the annual emission fee.

SCHEDULE I Month the Annual Emissions Fee is Due (Accounting Period) Counties in the Monthly Grouping

January	Anderson, Bedford, Benton, Bledsoe, Blount, Bradley, and Campbell
February	Cannon, Carroll, Carter, Cheatham, Chester, Claiborne, Clay, and Cocke
March	Coffee, Crockett, Cumberland, Davidson, Decatur, DeKalb, Dickson, Dyer, and Fayette
April	Fentress, Franklin, Gibson, Giles, Grainger, Greene, and Grundy
May	Hamblen, Hamilton, Hancock, Hardeman, Hardin, Hawkins, Haywood, and Henderson
June	Henry, Hickman, Houston, Humphreys, Jackson, Jefferson, Johnson, Knox, Lake, Lauderdale, Lawrence, and Lewis
July	Lincoln, Loudon, McMinn, McNairy, Macon, and Madison
August	Marion, Marshall, Maury, Meigs, Monroe, Montgomery, Moore, and Morgan
September	Obion, Overton, Perry, Pickett, Polk, Putnam, and Rhea
October	Roane, Robertson, Rutherford, Scott, Sequatchie, Sevier, and Shelby
November	Smith, Stewart, Sullivan, Sumner, Tipton, Trousdale, Unicoi, and Union
December	Van Buren, Warren, Washington, Wayne, Weakley, White, Williamson, and Wilson

² Note that some sources with allowable emissions below specific thresholds are not subject to the requirement to pay annual emission fees. Contact the Emission Inventory Program at apc.inventory@tn.gov if you have any questions.

Appendix 6: Emission Statement for VOC and NO_x

Not Applicable

Appendix 7: Compliance Certification Statement

Facility (Permittee): International Paper dba Morristown Container

Facility Address: 5032 S. Davy Crocket Parkway, Morristown, TN

Facility ID: 32-0028

Conditional Major Permit Number	Reporting Period	Report Deadline

This report is required pursuant to TAPCR 1200-03-09-.02(11)(a).

Responsible Person Certification

I, the undersigned, am a Responsible Person (as described in **Condition G1**) of the facility for which this report is being submitted. This document consists of _____ pages and they are numbered from page ____ to _____. As a Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Annual Compliance Status Report is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Appendix 8: Agreement Letters



5032 S Davy Crockett Pkwy
Morristown, TN 37813
Phone: (423) 318-1200

March 28, 2022

Mr. Jerry Swinea, Environmental Consultant III
Tennessee Department of Environmental Quality
Division of Air Pollution Control
William R. Snodgrass TN Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

**Re: Agreement Letter for Conditional Major Air Permit
International Paper – Morristown Facility**

Dear Mr. Swinea:

As a follow-up to our March 23, 2022, virtual meeting and your subsequent correspondence, International Paper (IP) is submitting this letter to confirm the conditional major status and the compliance method for maintaining that status for the facility it owns and operates in Morristown, Tennessee (Facility or IP Morristown).

IP Morristown agrees to restrict emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAP). VOC emitted from the Facility will not exceed 10 tons during any month and 98.9 tons during any period of twelve consecutive months. The maximum emission rate from the entire facility for any single HAP, listed pursuant to Section 112(b) of the Federal Act, will not exceed 9.9 tons per year. Total emissions of all HAPs from the entire facility will not exceed 24.9 tons per year. The emissions limitations will be maintained through recordkeeping monthly. IP Morristown will provide records at the request of the Tennessee Department of Environmental Quality.

Should you have any questions about this submittal, please feel free to contact me at 423-318-1201 or MikeR.Thompson@ipaper.com or Meghan Skemp at 281-201-1246 or mskemp@all4inc.com.

Sincerely,
IP Morristown


Mike Thompson
General Manager

cc: Meghan Skemp (ALL4)



June 9, 2022

Tennessee Department of Environmental Quality
Division of Air Pollution Control
William R. Snodgrass TN Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

**Re: Agreement Letter for Conditional Major Air Permit
International Paper – Morristown Facility
5032 South Davy Crockett Parkway, Morristown, TN
Permit No. 466831**

Dear Technical Secretary:

On behalf of International Paper (IP) Morristown Facility (Facility or IP Morristown), the following permit limitations are agreed upon for the natural gas-fired high-pressure boiler (Source 32-0028-01), which generates steam for process use and heating at the above referenced facility:

- Fuel oil usage (used for backup) shall not exceed 1,100,000 gals/year during any period of 12 consecutive months.
- SO₂ emitted by the boiler shall not exceed 40 tons/year during any period of 12 consecutive months.

IP Morristown shall demonstrate compliance with these limitations by keeping fuel receipts and firing less fuel oil than the amount described above.

Should you have any questions about this submittal, please feel free to contact me at 423-318-1201 or MikeR.Thompson@ipaper.com or Meghan Skemp at 281-201-1246 or mskemp@all4inc.com.

On behalf of IP Morristown, I agree to the above limitations. I am authorized to represent and bind the facility in environmental affairs.

ALL4 // Your environmental compliance is clearly our business

info@all4inc.com

www.all4inc.com

Sincerely,
IP Morristown



Mike Thompson
General Manager

cc: Meghan Skemp (ALL4)

ALL4 // Your environmental compliance is clearly our business

info@all4inc.com

www.all4inc.com

Appendix 9: Example Logs

Monthly VOC and HAP Calculation Table

Month/Year:								Emissions					
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]	[12]	[13]	[14]
Material ID	Material Name	Material Usage (gal/month or lb/mo)	Material Density (lb/gal)	VOC Content (wt% or lb VOC/gal)	HAP ₁ Content (wt% or lb HAP ₁ /gal)	HAP ₂ ¹ Content (wt% or lb HAP ₂ /gal)	Total HAP Content (wt% or lb HAP ₁ /gal)	VOC (lb/mo)	VOC (ton/mo)	HAP ₁ (lb/mo)	HAP ₁ (ton/mo)	Total HAP (lb/mo)	Total HAP (ton/mo)
Total													

¹ The columns for individual HAP should be repeated for each HAP contained in the materials used. Monthly emissions shall be calculated for each individual HAP. Identify each HAP by name and/or CAS# in the appropriate column headings.

[9] VOC Emissions (lb/mo) = [3] Material Usage (gal/mo) * [4] Material Density (lb/gal) * [5] VOC Content (wt%), or

[9] VOC Emissions (lb/mo) = [3] Material Usage (gal/mo) * [5] VOC Content (lb/gal)

[10] VOC Emissions (ton/mo) = [9] VOC Emissions (lb/mo) / 2,000 lb/ton

[11] HAP₁ Emissions (lb/mo) = [3] Material Usage (gal/mo) * [4] Material Density (lb/gal) * [6] HAP₁ Content (wt%), or

[11] HAP₁ Emissions (lb/mo) = [3] Material Usage (gal/mo) * [6] HAP₁ Content (lb/gal)

Annual VOC and HAP Calculation Table

Month/Year	VOC		HAP ₁		HAP ₂		Total HAP	
	[10] (ton/mo)	(ton/12 consecutive mo) ¹	[11] (ton/mo) ²	(ton/12 consecutive mo)	(ton/mo) ²	(ton/12 consecutive mo)	[14] (ton/mo)	(ton/12 consecutive mo)

¹ The tons per 12-consecutive month values are the sum of the emissions in the 11 months preceding the month just completed + the emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this table, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months].

² The columns for individual HAP should be repeated for each HAP contained in the materials used. Monthly emissions should be calculated for each individual HAP. Identify each HAP by name and/or CAS# in the appropriate column headings

Appendix 10: General Provisions for 40 CFR Part 60, Subpart Dc

You are required to comply with the following General Provisions of the federal Standards of Performance for New Stationary Sources (NSPS):

General provisions citation 40 CFR	Subject of citation	Applies to subpart	Explanation
§60.1	General applicability of the General Provisions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.2	Definitions	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.3	Units and abbreviations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.4	Address	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.5	Determination of construction or modification	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.6	Review of plans	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.7	Notification and Recordkeeping	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.8	Performance tests	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.9	Availability of information	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.10	State Authority	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.11	Compliance with standards and maintenance requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.12	Circumvention	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.13	Monitoring requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.14	Modification	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.15	Reconstruction	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.16	Priority list	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
§60.17	Incorporations by reference	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.18	General control device requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
§60.19	General notification and reporting requirements	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

TAPCR 1200-03-09-.03(8)