



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
BUTLER COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-01440**

**Fac ID: 1409010021**

**DATE: 8/27/2004**

Smurfit Stone Container Corporation  
Win Edge  
407 Charles Street  
Middletown, OH 45042

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: USEPA

HCDES



**Permit To Install  
Terms and Conditions**

**Issue Date: 8/27/2004  
Effective Date: 8/27/2004**

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-01440**

Application Number: 14-01440  
Facility ID: 1409010021  
Permit Fee: **\$0**  
Name of Facility: Smurfit Stone Container Corporation  
Person to Contact: Win Edge  
Address: 407 Charles Street  
Middletown, OH 45042

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**407 Charles Street  
Middletown, Ohio**

Description of proposed emissions unit(s):  
**The facility has a requested a permit to install modification for the 28 MMBTU per hour boiler.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

  
Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## **4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition

declared invalid.

## **6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

## **7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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**Modification Issued: 8/27/2004**

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**10. Permit To Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

**11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**12. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**4. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

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within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**5. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**6. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**7. Applicability**

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This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM/PM10	2.5
SO2	38.0
NOX	17.8
CO	10.51
VOC	0.70

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**Smurl**

**PTI A**

**Modification Issued: 8/27/2004**

Emissions Unit ID: B004

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
B004 - Boiler 315 - 28 MMBtu	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-10(B)(1)
	OAC rule 3745-17-07(A)
	OAC rule 3745-18-15(E)(2)
	OAC rule 3745-23-06(B)

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**PTI A**

**Modification Issued: 8/27/2004**

Emissions Unit ID: B004

Applicable Emissions Limitations/Control Measures	rule 3745-18-15(E)(2), and OAC rule 3745-23-06(B).
while burning No. 2 fuel oil: 0.020 lb PM10/MMBtu of actual heat input 0.14 lb NOx/MMBtu of actual heat input 1.0 lb/hr CO 0.04 lb/hr VOC	0.020 lb PM/MMBtu of actual heat input  Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
while burning natural gas: 0.020 lb PM10/MMBtu of actual heat input 0.0006 lb SO2/MMBtu of actual heat input 0.1 lb NOx/MMBtu of actual heat input 2.4 lbs/hr CO 0.16 lb/hr VOC	0.31 lb SO2/MMBtu of actual heat input  See term and condition A.2.c
Annual Emissions when burning either fuel shall not exceed the following: 2.5 TPY PM/PM10 38.0 TPY SO2 17.8 TPY NOx 10.51 TPY CO 0.70 TPY VOC	
See term and condition A.II.3.	
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B)(1), OAC rule 3745-17-07(A), OAC	

**Smurl****PTI A****Modification Issued: 8/27/2004**

Emissions Unit ID: B004

**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas and/or distillate fuel oil, compliance with the fuel oil sulfur content limit and compliance with the visible and mass emissions limitations.
- 2.b** The lb/MMBtu emissions limitations for NO<sub>x</sub> and all of the lb/hr emissions limitations outlined are based upon the emission unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.
- 2.c** The permittee shall satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by complying with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

**II. Operational Restrictions**

- 1. The quality of the oil burned in this emissions unit shall have a combination of sulfur content and heat content that is sufficient to comply with the allowable SO<sub>2</sub> emission limitation of 0.31 lb SO<sub>2</sub>/MMBtu of actual heat input.
- 2. The permittee shall burn only natural gas and/or distillate fuel oil in this emissions unit.
- 3. The sulfur content of the distillate fuel oil used in this emissions unit shall not exceed 0.3% by weight.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(E).] A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294,) or equivalent methods as approved by

the Director.

The permittee shall maintain records of the oil burned in this emissions unit in accordance the following:

Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu).[The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(E).] A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emission unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit.

A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing". The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu).[The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(E).]

2. For each day during which the permittee burns a fuel other than natural gas and/or distillate fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

Emissions Unit ID: B004

3. The permittee shall maintain monthly records of the type and total amount of fuel burned in this emissions unit.

#### IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which shows a deviation of the allowable sulfur dioxide limitation based upon the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or distillate fuel oil was burned in this emissions unit. Each report shall be submitted within 45 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the sulfur content restriction in section A.II.3 of this permit.
4. The quarterly deviation reports shall be submitted in accordance with the General Term and Conditions of this permit.

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:  
0.020 lb PM/MMBtu of actual heat input from oil or gas combustion  
0.020 lb PM10/MMBtu of actual heat input from oil or gas combustion  
2.5 TPY PM/PM10

Applicable Compliance Method:

When firing natural gas or distillate oil, compliance with this emission limitation may be demonstrated by multiplying the maximum lb/MMBtu limit by the maximum heat input capacity of the boiler then by 8760 hours per year. That total is then divided by 2000 pounds per ton.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 5 and the

procedures specified in OAC rule 3745-17-03(B)(9) while firing distillate oil.

3. Emission Limitation:  
 0.31 lb SO<sub>2</sub>/MMBtu of actual heat input from oil combustion  
 0.3% by weight, sulfur content of the distillate fuel oil  
 38.0 TPY SO<sub>2</sub>

Applicable Compliance Method:

Compliance may be demonstrated based on the record keeping requirements specified in sections A.III.1 of this permit. Compliance shall be demonstrated by documenting that each shipment of oil meets the limitations.

If testing is required to demonstrate compliance with the allowable emission limit of 0.31 lb SO<sub>2</sub>/MMBtu of actual heat input, testing shall be conducted in accordance with 40 CFR Part 60, Appendix A, Method 6.

For the use of natural gas, compliance may be determined by dividing the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lbs SO<sub>2</sub>/MM cu. ft. by the heat content of the fuel in MMBtu/MM cu. ft.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/MMBtu limitations specified in A.1. Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage record from term and condition III.3.

4. Emission Limitations-  
 0.14 lb of NO<sub>x</sub>/MMBtu of actual heat input from oil combustion  
 0.1 lb of NO<sub>x</sub>/MMBtu of actual heat input from natural gas  
 17.8 TPY NO<sub>x</sub>

Applicable compliance method-

When firing distillate oil, compliance with this emission limitation may be demonstrated by dividing the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.3-1 (9/98) for NO<sub>x</sub> from number two fuel oil combustion (20 lbs of particulate/1000 gal), by the heat content of the fuel in MMBtu/gallon.

For the use of natural gas, compliance may be determined by dividing the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 100 lbs NO<sub>x</sub>/MM cu. ft. by the heat content of the fuel in MMBtu/MM cu. ft.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/MMBtu and lb/hr limitations specified in A.1. Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage record from term and

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**PTI A**

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Emissions Unit ID: B004

condition III.4.

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5. Emission Limitations-
- 1.0 lb/hr CO from oil combustion
  - 2.4 lbs/hr CO from gas combustion
  - 10.51 TPY CO

Applicable compliance method-

When firing distillate oil, compliance with this emission limitation may be demonstrated by multiplying the maximum fuel oil burning capacity of the emissions unit (gal/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Fifth Edition, Section 1.3, Table 1.3-1 (9/98) for CO from number two fuel oil combustion (5 lbs of CO/1000 gal).

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 84 lbs CO/MM cu. ft.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/hr limitations specified in A.1. Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage record from term and condition III.4.

6. Emission Limitations-
- 0.04 lb/hr VOC from oil combustion
  - 0.16 lb/hr VOC from gas combustion
  - 0.70 TPY VOC from gas combustion

Applicable compliance method-

When firing distillate oil, compliance with this emission limitation may be demonstrated by multiplying the maximum fuel oil burning capacity of the emissions unit (gal/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Fifth Edition, Section 1.3, Table 1.3-3 (9/98) for NMTOC from number two fuel oil combustion (0.2 lbs of VOC/1000 gal).

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 5.5 lbs VOC/MM cu. ft.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/hr limitations specified in A.1. Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage record from term and condition III.4.

**Smurfit Stone Container Corporation**  
**PTI Application: 14-01440**  
**Modif**

**Facility ID: 1409010021**

Emissions Unit ID: B004

**VI. Miscellaneous Requirements**

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements contained in permit to install 14-01440 as issued on November 25, 1987 and as modified on February 7, 1996.

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PTI A

Modification Issued: 8/27/2004

Emissions Unit ID: B004

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B004 - Boiler 315 - 28 MMBTU (standby boiler)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None