

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **14-05083**

Jefferson Smurfit Corp

A. Source Description

This Permit to Install (PTI) 14-05083 covers one lithographic printing press. The facility has requested a federally enforceable PTI.

B. Facility Emissions and Attainment Status

The facility has requested the incorporation of federally enforceable limitations. This will synthetically limit the facility's organic compound emissions to less than 100 tons per year (TPY) to avoid Title V applicability. The facility will be limited to 97.4 tons per year. The proposed new emissions unit, R009 will be limited to 31 tons per year. In the previous PTI 14-4234, the facility was limited to 91 tons per year for organic compounds. However, emissions unit K002 (separately limited to 4.5 TPY OC) was never installed, and emissions unit R007 (separately limited to 20.1 TPY OC) will be removed from the facility. With the issuance of this PTI and the modification of PTI 14-4234, this facility will still be minor for Title V purposes.

C. Source Emissions

Potential emissions for emissions unit R009 have been calculated based on the maximum capacity of the equipment and 8760 hrs/yr of operation. The potential emissions from the emissions unit in the absence of a federally enforceable PTI is 72.5 TPY for organic compounds. The emissions limitations outlined in this PTI will limit organic compound emissions from emissions unit R009 to 31.0 TPY. The facility will maintain usage records and submit semi-annual reports as described in the special terms and conditions for PTI 14-05083.

D. Conclusion

The terms and conditions in this PTI will limit ink, coatings, fountain solution additives and cleanup materials so that emissions unit R009 has a potential to emit of 31.0 TPY OC. The entire facility will be limited to less than 100 TPY OC thus exempting them from Title V. The facility will maintain usage records and submit semi-annual reports as outlined in the additional terms and conditions for all emissions units to demonstrate compliance.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
BUTLER COUNTY**

CERTIFIED MAIL

Application No: 14-05083

DATE: 4/3/2001

Jefferson Smurfit Corporation
Tim Kalasek
407 Charles Street
Middletown, OH

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA HCDES KY IN OH-KY-IN Reg Coun of Govt



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 14-05083

Application Number: 14-05083
APS Premise Number: 1409010838
Permit Fee: **To be entered upon final issuance**
Name of Facility: Jefferson Smurfit Corporation
Person to Contact: Tim Kalasek
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 proposed installing an offset lithographic printing press.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit 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 emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Jefferson Smurfit Corporation

Facility ID: 1409010838

PTI Application: 14-05083

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. 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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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

Jefferson Smurfit Corporation

Facility ID: 1409010838

PTI Application: 14-05083

Issued: To be entered upon final issuance

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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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 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.

9. 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

Jefferson Smurfit Corporation

Facility ID: 1409010838

PTI Application: 14-05083

Issued: To be entered upon final issuance

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.

10. 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.

11. Applicability

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).

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- 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

Jefferson Smurfit Corporation

Facility ID: 1409010838

PTI Application: 14-05083

Issued: To be entered upon final issuance

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 thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

15. 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.

B. 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>
OC	31.0
PM/PM10	0.036

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R009 - Lithographic printing press 160	<p>OAC rule 3745-31-05 (A)(3)</p> <p>OAC rule 3745-35-07(B) Synthetic Minor to Avoid Title V</p> <p>OAC rule 3745-17-07 (A)(1)</p> <p>OAC rule 3745-17-11</p> <p>OAC rule 3745-21-07 (G)(2)</p>

Jefferson Smurfit Corporation

PTI A-14-05003

Issue

Facility ID: 1409010838

Emissions Unit ID: R009

Applicable Emissions
Limitations/Control Measures

21.8 lbs OC/hr*

31.0 TPY OC, based upon a rolling, 12-month summation.

6 lbs/month PM-PM10

0.036 TPY PM-PM10

* This limit is applicable on any day when no photochemically reactive materials (PRMs) are employed in this emissions unit.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-21-07(G)(2) and OAC rule 3745-35-07(B).

See Term A.2.b

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

8 lbs OC/hr**

40 lbs OC/day**

** These limits are applicable on any day when PRMs are employed in this emissions unit.

See terms A.2.c and B.1 - B.7.

2. Additional Terms and Conditions

Jefferson Smurfit Corporation

PTI / 14 05003

Issue

Facility ID: 1409010838

Emissions Unit ID: **R009**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the coating usage limits, emissions limits, organic compounds (OC) content limits and compliance with the air toxics policy.
- 2.b** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.c** The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.d** The hourly emission limitation when employing non-photochemically reactive materials outlined in term A.1. are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum annual ink usage for this emissions unit shall not exceed 120,800 pounds per year based upon a rolling, 12-month summation of the ink usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the ink usage levels specified in the following table:

Month(s)	Maximum Allowable Ink Usage (in pounds)
1	20,133
1-2	30,200
1-3	40,278
1-4	50,333
1-5	60,400
1-6	70,467
1-7	80,533
1-8	90,600
1-9	100,667
1-10	110,733
1-11	120,800

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PTI

Emissions Unit ID: **R009****Issued: To be entered upon final issuance**

1-12	120,800
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After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual ink usage limitation shall be based upon a rolling, 12-month summation of the ink usage figures.

- The OC content of the inks shall not exceed 30 percent by weight as a rolling, 12-month weighted average.
- The maximum annual coating usage for this emissions unit shall not exceed 272,500 pounds per year based upon a rolling, 12-month summation of the coating usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage limitations specified in the following table:

Month(s)	Maximum Allowable Coating Usage (in pounds)
1	45,417
1-2	68,125
1-3	90,858
1-4	113,542
1-5	136,250
1-6	158,958
1-7	181,667
1-8	204,375
1-9	227,083
1-10	249,792
1-11	272,500
1-12	272,500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

- The OC content of the coatings shall not exceed 10 percent by weight as a rolling, 12-month weighted average.

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Emissions Unit ID: **R009**

Issued: To be entered upon final issuance

5. The maximum annual fountain solution additive usage for this emissions unit shall not exceed 14,800 pounds per year based upon a rolling, 12-month summation of the fountain solution additive usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee, shall not exceed the fountain solution additive usage levels specified in the following table:

Month(s)	Maximum Allowable Fountain Solution Additive Usage (in pounds)
1	2467
1-2	3700
1-3	4935
1-4	6167
1-5	7400
1-6	8633
1-7	9867
1-8	11,100
1-9	12,333
1-10	13,567
1-11	14,800
1-12	14,800

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fountain solution additive usage limitation shall be based upon a rolling, 12-month summation of the fountain solution additive usage figures.

6. The OC content of the fountain solution additives shall not exceed 35 percent by weight as a rolling, 12-month weighted average.
7. The maximum annual cleanup material usage for this emissions unit shall not exceed 27,500 pounds per year based upon a rolling, 12-month summation of the cleanup material usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

Month(s)	Maximum Allowable Cleanup Material Usage (in pounds)
1	4583
1-2	6875
1-3	9169
1-4	11,458
1-5	13,750
1-6	16,042
1-7	18,333
1-8	20,625
1-9	22,917
1-10	25,208
1-11	27,500
1-12	27,500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleanup material usage limitation shall be based upon a rolling, 12-month summation of the cleanup material usage figures.

8. The permittee shall operate the chiller system on emissions unit R009 to refrigerate the fountain solution while the press is running production.
9. The permittee shall store all spent OC containing cleaning materials and cleaning rags in covered containers.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records which list the following information for emissions unit R009:
 - a. The company identification of each ink, coating, fountain solution additive and cleanup material employed.
 - b. The amount of each ink, coating, fountain solution additive and cleanup material employed in pounds.
 - c. The weight percent OC content of each ink, coating and fountain solution additive.
 - d. The monthly weighted average OC content (in percent by wt.) for inks, coatings and

Jeffe**PTI**Emissions Unit ID: **R009****Issued: To be entered upon final issuance**

fountain solution additives.

- e. The monthly OC emissions in pounds or tons from this emissions units based on a 95% organic solvent retention for inks and 100% organic solvent evaporation for coatings, fountain solution additives and cleanup material. If the permittee sends waste collected for waste disposal, the permittee may take a credit for that in emissions calculations provided that the permittee keeps adequate records to calculate the total amount of OCs in the waste disposed of from this emissions unit.
 - f. The updated rolling, 12-month total usage for the inks, coatings, fountain solution additives and cleanup materials in pounds per year.
 - g. During the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative ink, coating, fountain solution additive and cleanup material usage, in pounds, for each calendar month.
 - h. The updated rolling, 12-month weighted average OC content (in percent by wt.) for inks, coatings and fountain solution additives.
 - i. The updated rolling, 12-month total OC emissions in tons per year.
2. The permittee shall collect and record the following information for each day that a photochemically reactive material is used in emissions unit R009:
 - a. The company identification for each ink, coating, fountain solution additive and cleanup material employed.
 - b. Documentation on whether or not each ink, coating, fountain solution additive and cleanup material is a photochemically reactive material.
 - c. The number of pounds of each ink, coating, fountain solution additive and cleanup material employed.
 - d. The weight percent OC content of each ink, coating, fountain solution additive and cleanup material.
 - e. The OC emission rate for each ink, coating, fountain solution additive and cleanup material, in pounds per day; based on a 95% organic solvent retention for inks and 100% organic solvent evaporation for coatings, fountain solution and cleanup material. If the permittee sends waste collected for waste disposal, the permittee may take a credit for that in

Jefferson

PTI

Emissions Unit ID: **R009****Issued: To be entered upon final issuance**

emissions calculations provided that the permittee keeps adequate records to calculate the total amount of OCs in the waste disposed off from this emissions unit.

- f. The total OC emissions rate from all inks, coatings, fountain solution additive and cleanup material, in pounds per day.
- g. The total number of hours the emissions unit was in operation.
- h. The average hourly OC emission rate for all inks, coatings, fountain solution additives and cleanup materials, i.e., (f)/(g), in pounds per hour (average).

[Note: The information must be for the inks, coatings and fountain solution, **as employed**, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically" are based upon OAC rule 3745-21-01(C)(5).]

- 3. The permit to install for this emissions unit R009 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Jefferson Smurfit Corporation

PTI A-11-11-11 11 05002

Issue**Facility ID: 1409010838****Emissions Unit ID: R009**

Pollutant 1: 2-Butoxyethanol

TLV (ug/m3): 96,663

Maximum Hourly Emission Rate (lbs/hr): 0.053

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 3.3

MAGLC (ug/m3): 2301

Pollutant 2: Ammonia

TLV (ug/m3): 17,400

Maximum Hourly Emission Rate (lbs/hr): 0.083

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 5.1

MAGLC (ug/m3): 414

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior

Issued: To be entered upon final issuance

to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

4. The permittee shall collect and record the following information each month:

- a. The name and identification number of each ink, coating, fountain solution additive and cleanup material.
- b. The individual HAP¹ content for each HAP of each ink, coating, fountain solution additive, and cleanup material in weight percent of individual HAP.
- c. The total combined HAP content of each ink, coating, fountain solution additive, and cleanup material in weight percent of combined HAPs (sum all the individual HAP contents from b).
- d. The number of pounds of each ink, coating, fountain solution additive and cleanup material.
- e. The total individual HAP emissions for each HAP from all inks, coatings, fountain solution additives, and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b times d) for each ink, coating, fountain solution additive and cleanup material).
- f. The total combined HAP emissions from all inks, coatings, fountain solution additives and cleanup materials, in pounds or tons per month [the sum of © times d) for each ink, coating, fountain solution additive and cleanup material].
- g. The updated rolling, 12- month total of the individual HAP emissions for each HAP from all inks, coatings, fountain solution additives and cleanup materials employed, in pounds or tons.

Jefferson Smurfit Corporation

PTI / 14 05003

Issue

Facility ID: 1409010838

Emissions Unit ID: R009

- h. The updated rolling, 12-month total of the total combined HAP emissions from all inks, coatings, fountain solution additives and cleanup materials employed, in pounds or tons.

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

D. Reporting Requirements

1. The permittee shall submit semi-annual reports which include the following information:
 - a. The updated rolling, 12-month total usage for inks, coatings, fountain solution additives and cleanup materials in pounds per year; for each month.
 - b. The updated rolling, 12-month weighted average OC content (in percent by wt.) for inks, coatings and fountain solution additives; for each month.
 - c. The updated rolling, 12-month total OC emissions in tons per year; for each month.
 - d. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative ink, coating, fountain solution additive and cleanup material usage levels.

These reports shall be submitted by August 15 and February 15 of each year and shall cover the previous six calendar months (January to June and July to December, respectively).

2. The permittee shall notify the Director of any record showing that this emissions unit has exceeded the emission limitations and/or the operational limitations outlined in this permit. A copy of such record shall be sent to the Director within 30 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in term A.2.c. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.

E. Testing Requirements

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Method 9, 40 CFR Part 60, Appendix A.
2. Compliance with the usage limitations in term B.1, B.3, B.5 and B.7 shall be demonstrated by the record keeping in term C.1.
3. Compliance with the weight percent OC content limitations in term B.2, B.4 and B.6 shall be demonstrated by the record keeping in term C.1.

4. Compliance with the HAPs emission limitations in term A.2.c shall be demonstrated by the record keeping requirements specified in term C.4.

Jefferson Smurfit Corporation

PTI / 14 05003

Issue

Facility ID: 1409010838

Emissions Unit ID: R009

5. Compliance with 8 pounds per hour and 40 pounds per day emission limitations shall be demonstrated by the record keeping in term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1., C.2., and C.4, D and E.

NEW SOURCE REVIEW FORM B

PTI Number: 14-05083 Facility ID: 1409010838

FACILITY NAME Jefferson Smurfit Corporation

FACILITY DESCRIPTION The facility has proposed installing an offset lithographic printing press CITY/TWP Middletown

SIC CODE 2752 SCC CODE 4-05-004-01 EMISSIONS UNIT ID R009

EMISSIONS UNIT DESCRIPTION Lithographic printing press 160

DATE INSTALLED 6/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	6 lbs/mo	0.036	6 lbs/mo	0.036
PM ₁₀	attainment	6 lbs/mo	0.036	6 lbs/mo	0.036
Sulfur Dioxide					
Organic Compounds	attainment	21.8 lbs/hr	31.0	21.8 lbs/hr	31.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

BAT shall be satisfied for this emissions unit by usage, emissions and OC content limitations and compliance with the air toxics policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$-

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: 2- Butoxyethanol, Ammonia