

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Jefferson Smurfit Corporation (U.S.) - Boxboard Division.		
Premise Number	1409010021		
Number of Non-insignificant Emissions Units	5		
What makes this facility a Title V facility?	SO2, NOx		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes		

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

B005	20% Opacity as six-minute average.	N	Part 60 Subpart Dc	Y	Y	Y	Y	Y	N	OR. Use of inherently clean fuels - natural gas and/or No. 2 Fuel Oil M. Daily records when any fuel other than clean fuels burned. R. Daily records when any fuel other than clean fuels burned. Rp. Deviation reports when any fuel other than clean fuel burned. ET. 40 CFR Part 60, Appendix A, Method 9 will be used to determine compliance.
	0.020 lb PM/MMBtu actual heat input	17-10(B)(1)	N	Y	Y	Y	Y	Y	N	OR. Use of inherently clean fuels - natural gas and/or No. 2 Fuel Oil M. Daily records when any fuel other than clean fuels burned. R. Daily records when any fuel other than clean fuels burned. Rp. Deviation reports when any fuel other than clean fuel burned. ET. Compliance shall be demonstrated by Emission Factors from AP-42, External Combustion Sources. If testing is required to demonstrate compliance with the PM limit, Method 5 of 40 CFR Part 60, Appendix A shall be used.
	0.31 lb SO2/MMBtu actual heat input	31-05(D)	N	Y	Y	Y	Y	Y	N	OR. Use of low sulfur No. 2 Fuel Oil and natural gas M. Oil analysis of the sulfur content of each shipment of oil. R. Oil analysis records of the sulfur content of each shipment of oil. Rp. Quarterly Oil analysis reports. ET. Compliance shall be demonstrated by oil analysis reports. If testing is required to demonstrate compliance with the SO2 limit, Method 6 of 40 CFR Part 60, Appendix A shall be used.
	97.76 TPY SO2	31-05(D)	N	Y	N	Y	Y	Y	N	OR. Hours of operation limit and limitation on the total SO2 emissions based on a rolling, 12-month summation. R. Records of the hours of operation, the natural gas usage and the #2 fuel oil usage which are used to determine the SO2 emissions. Rp. Quarterly deviation reports ET. Compliance shall be determined by multiplying the fuel usage times the appropriate emission factor to determine the overall emissions.
	0.16 lb CO/MMBtu actual heat input	31-05(D)	N	N	N	N	N	Y	N	OR. None M. None R. None Rp. None ET. Compliance shall be demonstrated by performance testing using Method 10 of 40 CFR Part 60, Appendix A.
	50.46 TPY NOX	31-05(D)	N	Y	N	Y	Y	Y	N	OR. Hours of operation limit and limitation on the total NOx emissions based on a rolling, 12-month summation. R. Records of the hours of operation, the natural gas usage and the #2 fuel oil usage which are used to determine the NOx emissions. Rp. Quarterly deviation reports ET. Compliance shall be determined by multiplying the fuel usage times the appropriate emission factor to determine the overall emissions.

	0.10 lb NOx/MMBtu when burning gas and 0.18 lb NOx/MMBtu when burning oil	31-05(D)	N	N	N	N	N	Y	N	OR. None M. None R. None Rp. None ET. Compliance shall be demonstrated by performance testing using Method 7 of 40 CFR Part 60, Appendix A.
B006	20% Opacity as six-minute average.	N	Part 60 Subpart Dc	Y	Y	Y	Y	Y	N	OR. Use of inherently clean fuels - natural gas and/or No. 2 Fuel Oil M. Daily records when any fuel other than clean fuels burned. R. Daily records when any fuel other than clean fuels burned. Rp. Deviation reports when any fuel other than clean fuel burned. ET. 40 CFR Part 60, Appendix A, Method 9 will be used to determine compliance.
	0.020 lb PM/MMBtu actual heat input	17-10(B)(1)	N	Y	Y	Y	Y	Y	N	OR. Use of inherently clean fuels - natural gas and/or No. 2 Fuel Oil M. Daily records when any fuel other than clean fuels burned. R. Daily records when any fuel other than clean fuels burned. Rp. Deviation reports when any fuel other than clean fuel burned. ET. Compliance shall be demonstrated by Emission Factors from AP-42, External Combustion Sources. If testing is required to demonstrate compliance with the PM limit, Method 5 of 40 CFR Part 60, Appendix A shall be used.
	0.31 lb SO2/MMBtu actual heat input	31-05(D)	N	Y	Y	Y	Y	Y	N	OR. Use of low sulfur No. 2 Fuel Oil and natural gas M. Oil analysis of the sulfur content of each shipment of oil. R. Oil analysis records of the sulfur content of each shipment of oil. Rp. Quarterly Oil analysis reports. ET. Compliance shall be demonstrated by oil analysis reports. If testing is required to demonstrate compliance with the SO2 limit, Method 6 of 40 CFR Part 60, Appendix A shall be used.
	97.76 TPY SO2	31-05(D)	N	Y	N	Y	Y	Y	N	OR. Hours of operation limit and limitation on the total SO2 emissions based on a rolling, 12-month summation. R. Records of the hours of operation, the natural gas usage and the #2 fuel oil usage which are used to determine the SO2 emissions. Rp. Quarterly deviation reports ET. Compliance shall be determined by multiplying the fuel usage times the appropriate emission factor to determine the overall emissions.
	0.16 lb CO/MMBtu actual heat input	31-05(D)	N	N	N	N	N	Y	N	OR. None M. None R. None Rp. None ET. Compliance shall be demonstrated by performance testing using Method 10 of 40 CFR Part 60, Appendix A.

	50.46 TPY NOX	31-05(D)	N	Y	N	Y	Y	Y	N	OR. Hours of operation limit and limitation on the total NOx emissions based on a rolling, 12-month summation. R. Records of the hours of operation, the natural gas usage and the #2 fuel oil usage which are used to determine the NOx emissions. Rp. Quarterly deviation reports ET. Compliance shall be determined by multiplying the fuel usage times the appropriate emission factor to determine the overall emissions.
	0.10 lb NOx/MMBtu when burning gas and 0.18 lb NOx/MMBtu when burning oil	31-05(D)	N	N	N	N	N	Y	N	OR. None M. None R. None Rp. None ET. Compliance shall be demonstrated by performance testing using Method 7 of 40 CFR Part 60, Appendix A.
P002	VOC content of coatings employed in paper-coating section limited to 2.9 lbs/gal excl. water & exempt solvents.	21-09(F)	N	N	N	Y	Y	N	N	R. Monthly record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. USEPA Method 24 shall be used to determine compliance with the VOC content limits.
	8 lbs OC/hr and 40 lbs OC/day from paper-making operations on any day a PRM is employed.	21-07(G)(2)	N	N	N	Y	Y	Y	N	R. Daily records of the OC content and usage of photochemically reactive materials Rp. Quarterly deviation reports. ET. USEPA Method 24 shall be used to determine compliance with the OC content limits.
	476.4 lbs OC/day, 38.74 TPY OCs	31-05(D)	N	Y	Y	Y	Y	Y	Y	OR. Weight percent OCs and usage limits. M. Monthly record keeping required to demonstrate compliance. R. Monthly record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. Formulation data or USEPA Method 24 shall be used to determine compliance with the OC content limits.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

Instructions for Part III:

All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.