

Statement of Basis For Title V Permit

Company Name	Smurfit-Stone Corporation	
Premise Number	0616010001	
Number of Non-insignificant Emissions Units	14	
What makes this facility a Title V facility?	CO, NO _x , OC, PM	
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.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
B002	0.020 lb PM/MM BTU	17-10 (B)(1)		Y	Y	Y	Y	Y	N	Operational Restriction as stand-by unit only, 1008 hours per year, natural gas only.
B002	20 % opacity	17-07 (A)		Y	Y	Y	Y	Y	N	Operational Restriction as stand-by unit only, 1008 hours per year, natural gas only.
B003	0.020 lb PM/MM BTU	17-10 (B)(1)		Y	Y	Y	Y	Y	N	Operational Restriction as stand-by unit only, 1008 hours per year, natural gas only.
B003	20 % opacity	17-07 (A)		Y	Y	Y	Y	Y	N	Operational Restriction as stand-by unit only, 1008 hours per year, natural gas only.
B004	0.020 lb PM/MM BTU	17-10 (B)(1)		Y	Y	Y	Y	Y	N	Operational Restriction as stand-by unit only, 1008 hours per year, natural gas only.
B004	20 % opacity	17-07 (A)		Y	Y	Y	Y	Y	N	Operational Restriction as stand-by unit only, 1008 hours per year, natural gas only.
B005	0.020 lb PM/MM BTU	17-10 (B)(1)		Y	Y	Y	Y	Y	N	Operational Restriction as stand-by unit only, 1008 hours per year, natural gas only.
B005	20 % opacity	17-07 (A)		Y	Y	Y	Y	Y	N	Operational Restriction as stand-by unit only, 1008 hours per year, natural gas only.
B006	0.08 lb PM/MM BTU	N	Y	Y	Y	Y	Y	Y	N	PSD limit per 40 CFR 52.21; Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.
B006	0.02 SO2/MM BTU	N	Y	Y	Y	Y	Y	Y	N	PSD limit per 40 CFR 52.21; Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.
B006	0.40 lb CO/MM BTU	N	Y	Y	Y	Y	Y	Y	N	PSD limit per 40 CFR 52.21; Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.
B006	0.0242 lb HC/MM BTU	N	Y	Y	Y	Y	Y	Y	N	PSD limit per 40 CFR 52.21; Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.

B006	0.38 lb NOx/MM BTU	N	Y	Y	Y	Y	Y	Y	N	PSD limit per 40 CFR 52.21; Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.
B006	20% opacity	17-07 (A)		Y	Y	Y	Y	Y	N	Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.
B006	3200 gm mercury/24 hours	N	Y	N	N	N	N	Y	N	NESHAP limit per 40 CFR Part 61 Subpart E; Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.
B006	0.08 lb PM/MM BTU	N	Y	Y	Y	Y	Y	Y	N	OAC 3745-31-05 (A)(3) - equivalent to BACT; Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.
B006	0.02 SO2/MM BTU	N	Y	Y	Y	Y	Y	Y	N	OAC 3745-31-05 (A)(3)- equivalent to BACT; Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.
B006	0.40 lb CO/MM BTU	N	Y	Y	Y	Y	Y	Y	N	OAC 3745-31-05 (A)(3)- equivalent to BACT: Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.
B006	0.0242 lb HC/MM BTU	N	Y	Y	Y	Y	Y	Y	N	OAC 3745-31-05 (A)(3)- equivalent to BACT: Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.
B006	0.38 lb NOx/MM BTU	N	Y	Y	Y	Y	Y	Y	N	OAC 3745-31-05 - equivalent to BACT: Operational Restrictions for heat input, operation independent of other boiler units, fuel blending, scrubber operational parameters.
N001	0.10 lb PM/100 material charged	17-09 (B)		Y	Y	Y	Y	Y	N	Operational Restrictions for prevention of odors, scrubber operational parameters
N001	20% opacity	17-07 (A)		Y	Y	Y	Y	Y	N	Operational Restrictions for prevention of odors, scrubber operational parameters
P003	control HAPs	N	Y	Y	Y	Y	Y	Y	N	NESHAP limit 40 CFR Part 63 Subpart S (MACT) - 04/16/01 Compliance Date. Operational restrictions for MACT.
P003	3.5lb VOC/hour	N	Y	Y	Y	Y	Y	Y	N	OAC 3745-31-05 (A)(3) - applies to evaporator #2 ; Operational Restriction for condenser operational parameters
P003	15 TPY VOC	N	Y	Y	Y	Y	Y	Y	N	OAC 3745-31-05 (A)(3) - applies to evaporator #2; Operational Restriction for condenser operational parameters
P005	None									This emission source was installed in 1971.
P006	None									This emission source was installed in 1971.
P007	None									This emission source was installed in 1971.

P008	control HAPs	N	Y	Y	Y	Y	Y	Y	N	NESHAP limit 40 CFR Part 63 Subpart S (MACT) - (applies to LVHC components only) 04/16/01 Compliance Date; Operational restrictions for MACT.
P009	None									This emission source was installed in 1971.
P010	None									This emission source was installed in 1971.
T004	None									This emission source does not store any photochemically reactive organic liquids.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping 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, recordkeeping, 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.