Mr. Jack Kirkpatrick
Jefferson Smurfit Corporation (U.S.)
301 South Butterfield Road
Muncie, IN 47303-7317

Re: 035-11365
First Significant Permit Modification to
Part 70 No.: T 035-5970-00009

Dear Mr. Kirkpatrick:

Jefferson Smurfit Corporation was issued a permit on January 25, 1999, for a folding carton manufacturing operation. A letter requesting changes to this permit was received on September 22, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document and as specified below (bold emphasis added to new language):

1. Item (b) of Condition B.12 (Preventive Maintenance Plan) on Page 10 of the permit shall be revised as follows:

   B.12(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the Plan** does not cause or contribute to a violation of any **emission** limitation~~ on emissions or potential to emit~~.

2. The first sentence in Item (a)(5) of Condition C.16 (Compliance Monitoring Plan - Failure to Take Response Steps) on Page 25 of the permit shall be modified to clarify its intent as follows:

   C.16(a)(5) A Compliance Response Plan (CRP) for each compliance monitoring condition **contained in the section(s) entitled "Compliance Monitoring Requirements" of Section D** of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

3. Condition D.1.1 (Volatile Organic Compounds) on Page 30 of the permit shall be changed as follows to be consistent 326 IAC 8-5-5 and with the results of the most recent stack testing:

   D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

   (a) Pursuant to 326 IAC 8-5-5 (Graphic arts operation), the thermal oxidizer shall operate at all times that EU-52 is in operation **and the inks and coatings being applied do not comply with 326 IAC 8-5-5(c)(1) or (2)**. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,260 degrees Fahrenheit or a temperature~~, fan amperage and duct velocity~~ determined in ~~a~~ **the latest** stack test to ~~maintain a minimum~~ **achieve** ninety percent (90%) **reduction** ~~destruction of the volatile organic compound (VOC) captured~~. **When operating, the thermal oxidizer shall also maintain a minimum 3/4 inch (water) negative duct pressure or a duct pressure**

determined in the latest stack test to achieve an overall control efficiency of sixty-five percent (65%).

(b) When operating the thermal oxidizer to achieve the limit for rule 326 IAC 8-5-5, the thermal oxidizer shall maintain a minimum ~~ninety-three and six-tenths (93.6) percent capture efficiency and~~ ninety (90) percent destruction efficiency **and an overall control efficiency of sixty-five percent (65%).** ~~, equivalent to an overall control efficiency of eighty-four and two tenths percent (84.2%).~~ The destruction efficiency of ninety percent (90%) is required by 326 IAC 8-5-5 (c)(3)(B). **The overall control efficiency of sixty-five percent (65%) is required by 326 IAC 8-5-5(e)(2).**

4. The volatile organic compound (VOC) emission limitation in Condition D.1.2 (PSD Minor Limit) shall be rewritten to account for the use of compliant and non-compliant inks and coatings in the EU-52 press and to clarify the applicable limiting requirements as follows (note: Page 30a has been added and Page 31 of the permit has been adjusted to provide space for these changes):

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

~~(a) The input of VOC to the in-line gravure press, EU-52, shall be limited to 1,582 tons of VOC from coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period based on an overall eighty-four and two tenths percent (84.2%) control efficiency. This usage limit is required to limit the potential to emit of VOC to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.~~

~~(b) When operating, the thermal oxidizer shall maintain a minimum a overall control efficiency of eighty-four and two tenths percent (84.2%).~~

(a) The input VOC to the in-line gravure press, EU-52, from compliant inks and coatings and the input VOC to the in-line gravure press, EU-52, from non-compliant inks and coatings and the usage of cleanup solvents shall be limited by an amount, as shown by the following equation, to prevent the VOC emissions from these processes being greater than 250 tons per year:

(VOC from solvent usage) + (input VOC from compliant inks and coatings) + [input VOC from non-compliant inks and coatings X (1 - %control efficiency)] < 250 tons/12 consecutive months

This limitation is based upon the use of a thermal oxidizer with an overall control efficiency of at least 65.0%.

(b) The limiting requirements from Operation Permit No. 18-04-92-0252, issued August 19, 1988, Condition No. 4 , which established a VOC emission limit of 83 pounds per hour and 258 tons per year is not applicable because the emission limit established in this condition (D.1.2(a)) satisfies the requirements of the previous Operation Permit condition. Thus, Condition No. 4 of Operation Permit No. 18-04-92-0252 is hereby rescinded.

5. Condition D.1.5 (Preventive Maintenance Plan) on Page 32 of the permit has been revised to clarify applicability as follows:

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan~~,~~ of this permit, is required for ~~EU-52 and~~ **it's the** thermal oxidizer control device **for EU-52**.

6. Condition D.1.6 (Testing Requirements) on Page 32 of the permit shall be modified as follows to clarify the authority of the IDEM to require compliance testing for the purpose of demonstrating compliance:

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]
(a) The Permittee is not required to test EU-52 by this permit. However, IDEM ~~may require~~ **reserves the authority to request** compliance testing **in accordance with 326 IAC 2-1.1-11** ~~at any specific time when necessary to determine if the facility is in compliance~~. If testing is required by IDEM, compliance with the VOC destruction efficiency specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

(b) The Permittee is not required to test EU-31, EU-51 and EU-WT by this permit. However, IDEM ~~may require~~ **reserves the authority to request** compliance testing **in accordance with 326 IAC 2-1.1-11** ~~at any specific time when necessary to determine if the facility is in compliance~~. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

7. The compliance monitoring requirements in Condition D.1.10 (Monitoring) on Page 33 of the permit shall be changed as follows to be consistent with the revisions of Condition D.1.1 in Item 3, above:

D.1.10 Monitoring
(a) ~~Daily records of~~ the thermal oxidizer internal combustion zone (fire box) temperature shall be observed at least once per day when ~~EU-52~~ **the thermal oxidizer** is in operation. ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

(b) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~ **The duct pressure shall be observed at least once per week when the thermal oxidizer is in operation.**

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

8. Item (a) of Condition D.1.11 (Record Keeping Requirements - VOC) on Page 33 of the permit shall be revised to be consistent with the changes in Conditions D.1.1 and D.1.2 in Items 3 and 4, above, as follows (note: Page 34 has been adjusted to provide space for these changes):

D.1.11(a) To document compliance with Condition D.1.1 **and D.1.2**, the Permittee shall maintain **the following** records**:** ~~of the daily internal combustion zone temperature of the thermal oxidizer or indicate that EU-52 was not in operation that day.~~

(1) the dates and times of all periods of startup and shutdown of the thermal oxidizer;

(2) the dates and times of all periods when the thermal oxidizer is not being used because the press is operating entirely with compliant inks and coatings or without applying inks and coatings;

(3) daily records of the thermal oxidizer internal combustion zone (fire box) temperature; and

(4) weekly records of the duct pressure.

9. Condition D.2.2 (Testing Requirements) on Page 35 of the permit shall be modified as follows to clarify the authority of the IDEM to require compliance testing for the purpose of demonstrating compliance:

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]
The Permittee is not required to test this facility by this permit. However, IDEM ~~may require~~ **reserves the authority to request** compliance testing **in accordance with 326 IAC 2-1.1-11** ~~at any specific time when necessary to determine if the facility is in compliance~~. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

10. Condition D.4.3 (Testing Requirements) on Page 38 of the permit shall be modified as follows to clarify the authority of the IDEM to require compliance testing for the purpose of demonstrating compliance:

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
(a) The Permittee is not required to test two (2) natural gas-fired boilers by this permit. However, IDEM ~~may require~~ **reserves the authority to request** compliance testing **in accordance with 326 IAC 2-1.1-11** ~~at any specific time when necessary to determine if the facility is in compliance~~. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

(b) The Permittee is not required to test degreasing facilities by this permit. However, IDEM ~~may require~~ **reserves the authority to request** compliance testing **in accordance with 326 IAC 2-1.1-11** ~~at any specific time when necessary to determine if the facility is in compliance~~. If testing is required by

IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

11. The Part 70 Quarterly Report form for VOC emissions from the EU-52 press on Page 42 of the permit has been revised to be consistent with the changes to the limiting language in Condition D.1.2 of the permit detailed in Item 4, above.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, Janusz Johnson, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (2-8325), or dial (317) 232-8325.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
JKJ
cc: File - Delaware County
U.S. EPA, Region V
Delaware County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Jefferson Smurfit Corporation (U.S.)
301 South Butterfield Road
Muncie, Indiana 47303

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 035-5970-00009	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 25, 1999

First Significant Permit Modification: 035-11365	Pages Affected: 11, 25, 30, 30a, 31, 32, 33, 34, 35, 38 and 42
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Plan does not cause or contribute to a violation of any emission limitation.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition contained in the section(s) entitled "Compliance Monitoring Requirements" of Section D of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) solvent-based seven (7) station, thirty-six (36) inch wide roll-to-roll gravure press, known as EU-51, installed in 1969, exhausted through Stacks 1, 2 and 3, capacity: 9,000 pounds of cartons per hour.

(b) One (1) solvent-based eight (8) station, fifty-five (55) inch wide in-line gravure press known as EU-52, installed on June 15, 1980, equipped with a thermal oxidizer, known as EU-52-I, rated at 12.8 million British thermal units per hour, exhausted through Stack 4, capacity: 14,500 pounds of cartons per hour.

(c) One (1) water-based three (3) station forty-six (46) inch wide press, consisting of two (2) flexographic printing stations and one (1) gravure station, known as EU-31, exhausted through Stack 5, installed in 1968, capacity: 6,000 pounds of cartons per hour.

(e) One (1) cleanup and wash tank, identified as EU-WT, exhausted to Stack 9, installed in 1991, capacity: 4.77 gallons per day of solvent consumption.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

(a) Pursuant to 326 IAC 8-5-5 (Graphic arts operation), the thermal oxidizer shall operate at all times that EU-52 is in operation and the inks and coatings being applied do not comply with 326 IAC 8-5-5(c)(1) or (2). When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,260 degrees Fahrenheit or a temperature determined in the latest stack test to achieve ninety percent (90%) reduction. When operating, the thermal oxidizer shall also maintain a minimum 3/4 inch (water) negative duct pressure or a duct pressure determined in the latest stack test to achieve an overall control efficiency of sixty-five percent (65%).

(b) When operating the thermal oxidizer to achieve the limit for rule 326 IAC 8-5-5, the thermal oxidizer shall maintain a minimum ninety (90) percent destruction efficiency and an overall control efficiency of sixty-five percent (65%). The destruction efficiency of ninety percent (90%) is required by 326 IAC 8-5-5 (c)(3)(B). The overall control efficiency of sixty-five percent (65%) is required by 326 IAC 8-5-5(e)(2).

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) The input VOC to the in-line gravure press, EU-52, from compliant inks and coatings and the input VOC to the in-line gravure press, EU-52, from non-compliant inks and coatings and the usage of cleanup solvents shall be limited by an amount, as shown by the following equation, to prevent the VOC emissions from these processes being greater than 250 tons per year:

(VOC from solvent usage) + (input VOC from compliant inks and coatings) + [input VOC from non-compliant inks and coatings X (1 - %control efficiency)] **<** 250 tons/12 consecutive months

This limitation is based upon the use of a thermal oxidizer with an overall control efficiency of at least 65.0%.

(b) The limiting requirements from Operation Permit No. 18-04-92-0252, issued August 19, 1988, Condition No. 4 , which established a VOC emission limit of 83 pounds per hour

and 258 tons per year is not applicable because the emission limit established in this condition (D.1.2(a)) satisfies the requirements of the previous Operation Permit condition. Thus, Condition No. 4 of Operation Permit No. 18-04-92-0252 is hereby rescinded.

D.1.3 Hazardous Air Pollutants (HAPs)

The input of hazardous air pollutants to the entire source shall be limited such that after control the entire source shall emit less than ten (10) tons per consecutive twelve (12) month period for a single HAP and less than twenty-five (25) tons per consecutive twelve (12) month period. These limits make the requirements of 40CFR Part 63 Subpart KK [National Emission Standards for Printing and Publishing Industry] not applicable.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5(a)]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaner degreaser facility EU-WT shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for the thermal oxidizer control device for EU-52.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

(a) The Permittee is not required to test EU-52 by this permit. However, IDEM reserves the authority to request compliance testing in accordance with 326 IAC 2-1.1-11. If testing is required by IDEM, compliance with the VOC destruction efficiency specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

(b) The Permittee is not required to test EU-31, EU-51 and EU-WT by this permit. However, IDEM reserves the authority to request compliance testing in accordance with 326 IAC 2-1.1-11. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 HAPs

Compliance with the HAPs usage limitation contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 VOC and HAPs Emissions

Compliance with Conditions D.1.2 and D.1.3 shall be demonstrated at the end of each month based on the total volatile organic compounds as well as single and combination of HAPs usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Monitoring

(a) The thermal oxidizer internal combustion zone (fire box) temperature shall be observed at least once per day when the thermal oxidizer is in operation.

(b) The duct pressure shall be observed at least once per week when the thermal oxidizer is in operation.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements - VOC

(a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain the following records:

(1) the dates and times of all periods of startup and shutdown of the thermal oxidizer;

(2) the dates and times of all periods when the thermal oxidizer is not being used because the press is operating entirely with compliant inks and coatings or without applying inks and coatings;

(3) daily records of the thermal oxidizer internal combustion zone (fire box) temperature; and

(4) weekly records of the duct pressure.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) and/or Environmental Data Sheets necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for month; and

(5) The weight of VOCs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

D.1.12 Record Keeping Requirements - HAPs

To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs emission limits established in Condition D.1.3.

(a) The weight of HAP containing material used, including Environmental Data Sheets, purchase orders and invoices necessary to verify the type and amount used;

(b) The HAP content (weight percent) of each material used;

(c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and

(d) Identification of the facility or facilities associated with the usage of each HAP.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(d) Three (3) cyclone scrap separators, known as EU-C1, EU-C2, and EU-C3, all installed in 1979, exhausted through Stacks 6, 7 and 8, capacity: 1 ton of carton scrap per hour, each.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the cyclone scrap separators shall not exceed 2.75 pounds per hour when operating at a process weight rate of 2,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM reserves the authority to request compliance testing in accordance with 326 IAC 2-1.1-11. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Determination Requirement

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

(a) The Permittee is not required to test two (2) natural gas-fired boilers by this permit. However, IDEM reserves the authority to request compliance testing in accordance with 326 IAC 2-1.1-11. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

(b) The Permittee is not required to test degreasing facilities by this permit. However, IDEM reserves the authority to request compliance testing in accordance with 326 IAC 2-1.1-11. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Jefferson Smurfit Corporation (U.S.)
Source Address: 301 South Butterfield Road, Muncie, Indiana 47303
Mailing Address: 301 South Butterfield Road, Muncie, Indiana 47303
Part 70 Permit No.: T 035-5970-00009
Facility: In-line gravure press (EU-52)
Parameter: Input of VOC from coatings, dilution solvents, and cleaning solvents taking into account the thermal oxidizer.
Limit: Maintain VOC emissions less than 250 tons per twelve (12) consecutive months according to the following equation:

(VOC from solvent usage) + (input VOC from compliant inks and coatings) + [input VOC from non-compliant inks and coatings X (1 - %control efficiency)] < 250 tons/12 consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Equation Summation This Month	Equation Summation Previous 11 Months	Equation Summation 12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Jefferson Smurfit Corporation (U.S.)**
Source Location:	**301 South Butterfield Road, Muncie, Indiana 47303**
County:	**Delaware**
SIC Code:	**2657**
Operation Permit No.:	**T 035-5970-00009**
Operation Permit Issuance Date:	**January 25, 1999**
Permit Modification No.:	**035-11365-00009**
Permit Reviewer:	**Janusz Johnson**

The Office of Air Management (OAM) has reviewed a modification application from Jefferson Smurfit Corporation relating to the operation of a folding carton manufacturing plant.

History

On January 25, 1999, Jefferson Smurfit Corporation was issued a Part 70 Permit for a folding carton manufacturing operation. One of the facilities covered by the Part 70 Permit was an in-line gravure printing press designated EU-52 that had previously been permitted under Operating Permit No. 18-04-92-0252 issued on August 19, 1988. During the Part 70 Permit review process, a revised VOC usage limit was established for the press. This revised limit was specified in terms of total usage per twelve consecutive month period and was equivalent to the pound per hour VOC emission limit outlined in the original operating permit. On September 22, 1999, Jefferson Smurfit Corporation submitted a request to modify the Part 70 Permit to indicate that the original limiting condition (Condition 4) of the operating permit (18-04-92-0252) was no longer applicable. Jefferson Smurfit Corporation also requested the language of various conditions in the Part 70 Permit be clarified.

Determination

Condition No. 4 of Operating Permit No. 18-04-92-0252 limited the volatile organic compound (VOC) emissions from the EU-52 press to 83 pounds per hour and 258 tons per year. The revised limiting condition (Condition D.1.2(a)) in the Part 70 Permit limits the input VOC usage of the EU-52 press to 1,582 tons of VOC from coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period based on an overall eighty-four and two tenths percent (84.2%) control efficiency. This usage restriction limits the potential to emit of VOC to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. The OAM feels that the Part 70 Permit condition is equivalent to the original operating permit Condition No. 4, and is adequate to demonstrate compliance with 326 IAC 8-5-5 and 326 IAC 2-2. Therefore, the OAM will revise Condition D.1.2 of the Part 70 Permit to note that the requirements of Condition No. 4 of OP 18-04-92-0252 is no longer applicable and that the condition is thereby rescinded.

The revisions to the other Part 70 Permit conditions requested, and some additional language revisions, have been worked out in a joint agreement regarding a stay of the objection to the issuance of the Part 70 Permit filed by Jefferson Smurfit Corporation (Cause No. 99-A-J-2224). Those language revisions will be incorporated into the Part 70 Permit as a part of this Significant Permit Modification.

The specific changes to the Part 70 Permit are detailed in the Significant Permit Modification cover letter.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 22, 1999.

A Joint Agreement Regarding Stay of Cause No. 99-A-J-2224 was received on October 29, 1999.

Conclusion

The operation of the folding carton manufacturing plant shall be subject to the conditions of the attached proposed **Significant Permit Modification No. 035-11365-00009**.