ADEQ

OPERATING

AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 921-AOP-R3

Renewal # 1

IS ISSUED TO: Quebecor World, Inc. – Jonesboro Division

4708 Krueger Drive

Jonesboro, AR 72401

Craighead County

AFIN: 16-00181

and

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:
AND

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith Michaels

Date

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Table 1 - List of Acronyms

A.C.A.	Arkansas Code Annotated
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CSN	County Serial Number
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate matter
PM_{10}	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO_2	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Ton per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	Quebecor World, Inc. – Jonesboro Division
AFIN:	16-00181
PERMIT NUMBER:	921-AOP-R3
FACILITY ADDRESS:	4708 Krueger Drive Jonesboro, AR 72401
MAILING ADDRESS	4708 Krueger Drive Jonesboro, AR 72401
COUNTY:	Craighead
CONTACT POSITION:	David Hakenewerth
TELEPHONE NUMBER:	(870)935-7000
FAX NUMBER:	(870)930-1359
REVIEWING ENGINEER:	Paul Osmon
UTM North - South (Y):	Zone 15 3965.5 km N
UTM East - West (X):	Zone 15 713.7 km E

Section II: INTRODUCTION

Summary of Permit Activity

Quebecor World, Inc. – Jonesboro Division's initial Title V air permit is being renewed with the issuance of this permit. This permit modification also authorizes the addition of a new press No. 822-8 (SN-14) which will operate controlled by the existing Katec afterburners (SN-07 and SN-09). This will result in an increase in emission limits of 39.3 tons per year for the non-stack emissions from the new press and stack emissions from the outlet of the afterburners. There will also be minor changes in the record keeping for the facility. All calculations for the emissions sources have been re-calculated resulting in minor changes to some emission limits.

Process Description

The Quebecor World - Jonesboro Division, located in Jonesboro, Arkansas is a heatset, web offset lithographic printing facility. The major processes associated with this facility include pre-press or plate making operations, the lithographic printing presses (which are the primary emission sources at this facility), and bindery operations.

The pre-press or plate room operations include film developing and plate making. This operation is used to transfer the printing image to printing plates. The film developing and plate making equipment use aqueous-based chemical and have very small associated air emissions.

The heatset, web offset printing presses (SN-01, SN-02, SN-03, SN-04, SN-05, SN-08, SN-10, SN-13, and SN-14) consist of unwind reel stands, 6 to 9 print stations, natural gas fired dryers, chill stands and rollers, and folding equipment. Emissions of VOCs from the press dryers are controlled by two afterburner systems (SN-07 and SN-09) which use natural gas to support the combustion of VOC and maintain adequate afterburner temperatures. Propane is used as a backup fuel when natural gas is unavailable. The lithographic printing process is described in more detail below.

The raw materials used in the heatset process are the web (which is generally paper), inks, blanket wash, fountain solution and general cleaning solvents. The inks used in this process consist of pigments, binders, and high boiling point petroleum derived hydrocarbons.

The printing presses use an unwind stand, in-feed printing units, a dryer, a chill stand, and a folder. The web is continuously unwound from an unwind stand which also has the capability of splicing expiring web without stopping the printing process. After the web unwinds, it may pass through a heated web conditioner before entering the first print unit. In the first printing unit, ink and fountain solution are applied. Depending on the number of colors being printed, the web will pass either into a dryer or into additional printing units.

The dryers are recirculating hot air systems fueled by natural gas. The dryers raise the web temperature to approximately 275EF. The ink used in the heatset printing dries very quickly with the volatile portions of the ink exhausted from the dryer to the existing recuperative thermal

oxidizer emission control devices. The web passes over chill rolls where it is cooled to about 20E above ambient temperature before folding and cutting. Blanket wash may be performed manually or automatically and are considered non-point sources.

After printing, the product is cut, folded, assembled, bound, and packaged for shipping in the binder operations. The binding of magazines involves cutting, folding and grinding operations. Waste paper from these operations is collected in a paper trim dust collection system which includes a baghouse paper separator, a bailer system for the collected paper, and an induced draft fan. Exhaust from the induced draft fan is vented inside the building. Emissions from the dust collection system have been quantified and the dust collection system has been identified as an insignificant emissions unit. The bindery operations also include the use of glues for binding magazines and inserts. These glues are typically polyvinyl acetate (PVA) glues which have negligible VOC emissions. Finally, the bindery uses inkjet printers (SN-11) to print labels for direct mailing and shipping products.

The facility also has emissions from the solvents and adhesives used (SN-12)

Regulations

The following table contains the regulations applicable to this permit.

Table 2 - Regulations

Source No.	Regulation Citations
All	*Arkansas Water and Air Pollution Control Act*
All	*Arkansas Air Pollution Control Code* (Regulation 18)
All	*Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19)
All	*Regulations of the Arkansas Operating Air Permit Program* (Regulation 26)

The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

Table 3 – Emission Summary

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
Total Allowable Emissions		PM	0.5	2.1	
		PM_{10}	0.5	2.1	
		SO_2	0.1	0.2	
		VOC	95.5	298.9	
		CO	5.2	22.6	
		NO_x	6.2	26.9	
HAPs*		R.T. 1.0 HAP	18.75	78.80	
		R.T. 0.1 HAP	0.002	0.01	
		Glycol Ethers	4.45	12.61	
Air Contaminants**		None			
SN-01	Harris M-1000 Press #922	VOC	2.8	7.3	13
		Glycol Ether	0.27	0.72	
		R.T. 1.0 HAP	0.13	0.34	
SN-02	Harris M-1000B Press #822-2	VOC	3.8	9.8	13
		Glycol Ether	0.36	0.95	
		R.T. 1.0 HAP	0.17	0.45	

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
SN-03	APV Baker G-14 Press #822-3	VOC	5.3	13.8	13
		Glycol Ether	0.51	1.33	
		R.T. 1.0 HAP	0.24	0.63	
SN-04	APV Baker G-14 Press #822-4	VOC	4.7	12.2	13
		Glycol Ether	0.45	1.18	
		R.T. 1.0 HAP	0.21	0.56	
SN-05	Harris M-1000 Press #822-1	VOC	2.5	6.5	13
		Glycol Ether	0.24	0.63	
		R.T. 1.0 HAP	0.11	0.30	
SN-06	Press 623	Retired Equipment – 1997			
SN-07 SN-09	Afterburner No. 1 Afterburner No. 2	PM/PM_{10}	0.5	2.1	17
		SO_2	0.1	0.2	
		VOC	33.5	96.4	
		CO	5.2	22.6	
		NO_x	6.2	26.9	
		Glycol Ether	0.24	0.56	
		R.T. 1.0 HAP	0.02	0.06	
SN-08	APV Baker G-25W Press #822-5	VOC	7.4	19.6	13
		Glycol Ether	0.72	1.90	

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
		R.T. 1.0 HAP	0.34	0.90	
SN-10	Harris M-1000BE Press #822-6	VOC Glycol Ether R.T. 1.0 HAP	6.8 0.59 0.32	18.0 1.54 0.85	13
SN-11	Ink Jet Printers	VOC R.T. 1.0 HAP	12.2 12.2	53.3 53.3	19
SN-12	Press Room Miscellaneous Solvent and Adhesives	VOC R.T. 1.0 HAP R.T. 0.1 HAP	4.9 4.48 0.002	21.2 19.62 0.01	21
SN-13	Harris M1000B Press #822-7	VOC Glycol Ether R.T. 1.0 HAP	5.5 0.51 0.25	19.5 1.81 0.90	13
SN-14	Future Press – To Be Determined #822-8	VOC Glycol Ether R.T. 1.0 HAP	6.1 0.56 0.28	21.4 1.99 0.99	13

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

Section III: PERMIT HISTORY

The Jonesboro Division of World Color Press began operation in 1972.

921-A was the first permit issued to W. A. Krueger Company for this facility on February 28, 1989. The facility started operation in 1972 with one printing press. There were six printing presses by 1989. The only pollutant permitted was VOC and the amount permitted was 304 tons per year with no control equipment.

921-AR-1 was issued to Ringier America--Jonesboro Division on May 3, 1991. Permit limits for VOC was 199 tons per year. One afterburner was installed on the stack emissions from four of the presses. Two presses were operated without controls.

921-AR-2 was issued to Ringier America--Jonesboro Division on August 31, 1992. A seventh printing press and a second afterburner were installed at that time. Permit limits were 187.2 tons per year VOC, 21.22 tons of oxides of nitrogen, and 14.9 tons per year of carbon monoxide. Two presses operated without controls.

921-AR-3 was issued to Jonesboro Division of World Color Press, Inc. on July 10, 1997. One press (SN-06) was retired and the afterburner arrangement was changed such that only one press (SN-05) operated without controls. Facility emissions limits were 184.19 tons per year VOC, 25.04 tons per year of oxides of nitrogen, 15.33 tons per year of carbon monoxide, and 0.05 tons per year of sulfur dioxide.

921-AOP-R0 was issued to Jonesboro Division of World Color Press, Inc. on May 6, 1998. The afterburner arrangement was changed from the previous permit such that all presses were controlled via afterburners. HAPs were quantified for the first time in this permit. The ink jet printer and solvent and adhesive fugitive emissions were also quantified for the first time in this permit. Facility emissions limits were 220.8 tons per year VOC, 24.0 tons per year oxides of nitrogen, 14.9 tons per year carbon monoxide, 2.7 tons per year particulate matter and 0.1 tons per year sulfur dioxide.

921-AOP-R1 was issued to Jonesboro Division of World Color Press, Inc. on October 9, 1998. The modification was issued for the addition of another printing press (SN-13) and the addition of six new ink jet printers increasing the emissions at SN-11. Facility emission limits were 259.6 tons per year VOC, 26.3 tons per year oxides of nitrogen, 15.4 tons per year carbon monoxide, 3.0 tons per year particulate matter and 0.1 tons per year sulfur dioxide.

921-AOP-R2 was issued to Quebecor World – Jonesboro Division on August 20, 2001. The permit modification was issued to change the processes for minimizing emissions when a printing press must be operated while a afterburner system is down for emergency repairs. The emission limits were identical to the previous permit.

Section IV: SPECIFIC CONDITONS

Source No. SN-01, SN-02, SN-03, SN-04, SN-05, SN-08, SN-10, SN-12, and SN-14

Printing Presses

Process Description

There are eight heatset web offset printing presses installed and one planned at the Quebecor World, Inc. – Jonesboro Facility. Each press is equipped with a natural gas fired dryer and chill rolls for cooling the media after printing. Regular emissions from these presses are ducted to one of the afterburners with only the non-stack emissions going directly to the atmosphere.

Specific Conditions

1. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition by compliance with Specific Conditions No. 3, No. 4, and No. 5. [Regulation No. 19, §19.501 *et seq.* effective February 15, 1999 and 40 CFR Part 52, Subpart E]

Source No.	Description	Pollutant	lb/hr	tpy
SN-01	Harris M-1000 Press No. 922	VOC	2.8	7.3
SN-02	Harris M-1000B Pres No. 822-2	VOC	3.8	9.8
SN-03	APV Baker G-14 Press No. 822-3	VOC	5.3	13.8
SN-04	APV Baker G-14 Press No. 822-4	VOC	4.7	12.2
SN-05	Harris M-1000 Press No. 822-1	VOC	2.5	6.5
SN-08	APV Baker G-25W Press No. 822-5	VOC	7.4	19.6
SN-10	Harris M-1000BE Press No. 822-6	VOC	6.8	18.0
SN-13	Harris M-1000B Press No. 822-7	VOC	5.5	19.5
SN-14	Future Press – To Be Determined No. 822-8	VOC	6.1	21.4

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by compliance with Specific Conditions No. 3, No. 4, and No. 7. [Regulation No.18, §18.801 effective February 15, 1999, and A. C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Source No.	Description	Pollutant	lb/hr	tpy
SN-01	Harris M-1000 Press No. 922	Glycol Ether	0.27	0.72
		R.T. 1.0 HAP	0.13	0.34
SN-02	Harris M-1000B Pres No. 822-2	Glycol Ether	0.36	0.95
		R.T. 1.0 HAP	0.17	0.45
SN-03	APV Baker G-14 Press No. 822-3	Glycol Ether	0.51	1.33
		R.T. 1.0 HAP	0.24	0.63
SN-04	APV Baker G-14 Press No. 822-4	Glycol Ether	0.45	1.18
		R.T. 1.0 HAP	0.21	0.56
SN-05	Harris M-1000 Press No. 822-1	Glycol Ether	0.24	0.63
		R.T. 1.0 HAP	0.11	0.30
SN-08	APV Baker G-25W Press No. 822-5	Glycol Ether	0.72	1.90
		R.T. 1.0 HAP	0.34	0.90
SN-10	Harris M-1000BE Press No. 822-6	Glycol Ether	0.59	1.54
		R.T. 1.0 HAP	0.32	0.85
SN-13	Harris M-1000B Press No. 822-7	Glycol Ether	0.52	1.81
		R.T. 1.0 HAP	0.25	0.90
SN-14	Future Press – To Be Determined No. 822-8	Glycol Ether	0.56	1.99
		R.T. 1.0 HAP	0.28	0.99

3. The permittee shall operate the printing presses with their stack emissions processed through a functional afterburner during normal operations. The permittee shall follow the provisions of their latest Air Pollution Control System Contingency Plan during emergency failures of an afterburner. The initial plan dated May 15, 2000 is included as Appendix A. [§19.705 of Regulation 19, A. C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6].

4. The maximum allowable usage of ink, blanket wash solution (BW), and fountain solution (FW) at the facility shall not exceed the following values per consecutive 12-month period [§19.705 of Regulation 19, A. C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6].

SN #	Press #	Annual Ink Usage (Lbs)	Annual Automatic Blanket Wash Usage (Lbs)	Annual Manual Blanket Wash Usage (Lbs)	Annual Fountain Solution (Lbs)
SN-01	922	649,428	7,866	15,732	29,028
SN-02	822-2	873,228	10,572	21,144	39,012
SN-03	822-3	1,227,120	14,862	29,724	54,840
SN-04	822-4	1,084,752	13,134	26,268	46,468
SN-05	822-1	576,600	6,984	13,968	25,776
SN-08	822-5	1,746,456	21,150	42,300	78,048
SN-10	822-6	893,520	20,106	40,212	54,840
SN-13	822-7	1,207,000	21,300	42,600	71,000
SN-14	822-8	1,810,500	23,430	46,860	78,100

5. The ink used by the permittee shall not contain more than 45 weight % VOC monthly average, the blanket wash solution shall contain no more than 100 weight % VOC, and the fountain solution concentrate will contain no more than 22.5 weight % VOC. [§19.705 of Regulation 19, A. C.A.§8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6].

6. The permittee will maintain monthly records to demonstrate compliance with Specific Condition #4 and #5. The permittee will update the records by the last day of the month following the month the usages occurred. The permittee will keep the records onsite, and make the records available to Department personnel upon request. A semi-annual report containing this information shall be submitted to Department in accordance with General Provision No. 7. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E].

7. The blanket wash and fountain solution shall contain only those hazardous air pollutant compounds listed in the following table [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]:

Product Used	HAP Relative Toxicity	Maximum Weight Fraction

Blanket Wash	Glycol Ethers Relative Toxicity: 1.0	0.05 0.053
Fountain Solution	Glycol Ethers	0.09

8. The permittee will maintain monthly records to demonstrate compliance with Specific Condition #7. The permittee will update the records by the fifteenth day of the month following the month. The permittee will keep the records onsite, and make the records available to Department personnel upon request [[§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].

9. The permittee will maintain separate monthly record keeping for the actual quantities of ink, automatic blanket wash solution, manual blanket wash solution, and fountain solution used in SN-14. A monthly VOC emissions total for SN-14 based on a material balance will be completed each month utilizing the capture efficiencies and destruction efficiencies used in the application for this permit. This shall be completed on the form attached in Appendix B or its equivalent. A previous 12 months total shall also be completed each month. A semi-annual report containing this information shall be submitted to Department in accordance with General Provision No. 7. A 12 month emission summary in excess of 39.3 tons is a violation of this permit. [§19.705 of Regulation 19, 40 CFR Part 52, Subpart E, and 40 CFR 52.21].

SN-07 and SN-09

Afterburner No. 1 and No. 2

Source Description

Afterburners No. 1 and No. 2 are Katec Model No. 2016 recuperative thermal oxidation systems. They have a rated efficiency of 95% by their manufacturer. Stack emissions from the printing presses are routed through these two afterburners.

Specific Conditions

10. The permittee shall not exceed the emission rates set forth in the following table at SN-07 and SN-09. Compliance with Specific Conditions No. 4 and No. 12 shall represent compliance with this source's applicable requirements. [§19.501 of Regulation 19 and 40 CFR Part 52, Subpart E].

Pollutant	Lb/hr	tpy
PM_{10}	0.5	2.1
SO_2	0.1	0.2
VOC	33.5	96.4
CO	5.2	22.6
NO_x	6.2	26.9

11. The permittee shall not exceed the emission rates set forth in the following table at SN-07 and SN-09. Compliance with Specific Conditions No. 4 and No. 12 shall represent compliance with this source's applicable requirements. [§18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].

Pollutant	Lb/hr	Tpy
PM	0.5	2.1
Glycol Ethers	0.24	0.56
R.T. 1.0 HAPS	0.02	0.06

12. Visible emissions from Afterburner No. 1 and No. 2 (SN-07 and SN-09) shall not exceed 5% opacity as measured by EPA Reference Method No. 9. Permittee shall use only natural gas (utility natural gas or LPG) to fire the afterburner in order to assure compliance with this

opacity limit. [§18.501 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].

13. Thermal Afterburner No. 1 and No. 2 will be equipped with a temperature controller which monitors, records, and controls the operating temperature at or above 1300 ^{o} Fahrenheit any time a press controlled by the afterburner is operating. [§19.705 of Regulation 19, A. C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6].

14. The permittee shall measure the VOC emissions from Afterburner No. 1 and No. 2 once every 5 years starting in August, 2007 using EPA Reference Method25A or an equivalent method provided the equivalent method has been approved by the Department before use. The testing required shall be conducted over three, one hour periods. The test shall be conducted at a production rate representative of at least 90 percent of maximum facility production as established in the testing protocol. The presses shall be operating normally during that period. [§19.702 of Regulation 19 and 40 CFR Part 52, Subpart E].

SN-11

Ink Jet Printer Emissions

Source Description

Inkjet printers are used to print the mailing labels for magazines distributed directly from this facility.

Specific Conditions

15. The permittee shall not exceed the emission rates set forth in the following table at SN-11. Compliance with Specific Condition No.17 and No. 18 shall represent compliance with this source's applicable requirements. [§19.501 of Regulation 19 and 40 CFR Part 52, Subpart E].

Pollutant	Lb/hr	Tpy
VOC	12.2	53.3

16. The permittee shall not exceed the emission rates set forth in the following table at SN-11. Compliance with Specific Condition No. 17 and No. 20 shall represent compliance with this source's applicable requirements. [§18.801 of Regulation 18 and A.C.A.§8-4-203 as referenced by §8-4-304 and §8-4-311].

Pollutant	Lb/hr	Tpy
R.T. 1.0 HAPS (Methanol)	12.2	53.3

17. Material usage in the ink jet printer operations shall not exceed those listed the following table for any consecutive 12 month period. [§19.705 of Regulation 19, A.C.A.§8-4-203 as referenced by §8-4-304 and §8-4-311, and 40CFR 70.6].

MEOh Ink	MEOH Wash	Makeup Solvent
7,314 lbs/yr	7,314 lbs/yr	93,315 lbs/yr

18. The wash used by the permittee shall not contain more than 100 weight % VOC, the bindery MeOH ink shall not contain more than 80 weight % VOC, and the ink jet printer make-up solvent shall not contain more than 100 weight % VOC. [§19.705 of Regulation 19, A.C.A.§8-4-203 as referenced by §8-4-304 and §8-4-311, and 40CFR 70.6].

19. The permittee will maintain monthly records to demonstrate compliance with Specific Condition #16 and #17. The permittee will update the records by the fifteenth day of the month following the month. The permittee will keep the records onsite, and make the

records available to Department personnel upon request. A semi-annual report containing this information shall be submitted to Department in accordance with General Provision No. 7. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E].

20. The ink jet printer supplies used by the permittee shall contain compounds listed as Hazardous Air Pollutants only as listed in the following table. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Product Used	HAP Relative Toxicity	Maximum Weight Fraction
Inkjet Printer Wash	Relative Toxicity: 1.0	1.0
Bindery MEOH Ink	Relative Toxicity: 1.0	0.8
Ink Jet Printer Make-Up Solution	Relative Toxicity: 1.0	1.0

21. The permittee will maintain monthly records to demonstrate compliance with Specific Condition #20. The permittee will update the records by the fifteenth day of the month following the month. The permittee will keep the records onsite, and make the records available to Department personnel upon request [[§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].

SN-12

Press Room Emissions

Source Description

The maximum usage of miscellaneous solvents and adhesives at the facility is permitted at 43,600 pounds per year of miscellaneous solvents and 4,000 pounds per year of miscellaneous adhesives. However, the actual usage on an annual basis is significantly lower than the maximum usages identified.

Specific Conditions

22. The permittee shall not exceed the emission rates set forth in the following table at SN-12. The emission limits are based on the usage limits specified in Specific Conditions No. 24 and No. 25. Compliance with Specific Conditions No. 24 and No. 25 shall represent compliance with this source's applicable requirements [§19.501 of Regulation 19 and 40 CFR Part 52, Subpart E].

Pollutant	lb/hr	tpy
VOC	4.9	21.2

23. The permittee shall not exceed the emission rates set forth in the following table at SN-12. The emission limits are based on the usage limits specified in Specific Conditions No. 24 and 26. Compliance with Specific Conditions No. 24 and 26 shall represent compliance with this source's applicable requirements [§18.801 of Regulation 18 and A.C.A.§8-4-203 as referenced by §8-4-304 and §8-4-311].

HAP – Relative Toxicity	lb/hr	tpy
Relative Toxicity 1.0 HAP	4.48	19.62
Relative Toxicity 0.1 HAP	0.002	0.01

24. The usage of miscellaneous solvents and adhesives in the press room shall not exceed the limits listed in the following table per consecutive 12 month period [§19.705 of Regulation 19, A.C.A.§8-4-203 as referenced by §8-4-304 and §8-4-311, and 40CFR 70.6].

Yearly Solvent Usage	Yearly Adhesive Usage
43,600 lbs/yr	4,000 lbs/yr

25. The miscellaneous solvents used by the permittee shall not contain more than 97 weight % VOC, and the press room adhesives used shall not contain more than 1.1 weight % VOC. [§19.705 of Regulation 19, A.C.A.§8-4-203 as referenced by §8-4-304 and §8-4-311, and 40CFR 70.6].

26. The miscellaneous solvents and adhesives used by the permittee shall contain only those Hazardous Air Pollutant compounds listed in the following table: [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Product Used	HAP Relative Toxicity	Maximum Weight Fraction
Miscellaneous Solvents	Relative Toxicity 1.0	0.9
Miscellaneous Adhesives	Relative Toxicity 0.1	0.005

27. The permittee will maintain monthly records to demonstrate compliance with Specific Condition #24 and #25. The permittee will update the records by the fifteenth day of the month following the month. The permittee will keep the records onsite, and make the records available to Department personnel upon request. A semi-annual report containing this information shall be submitted to Department in accordance with General Provision No. 7. [§19.705 of Regulation 19 and 40 CFR Part 52, Subpart E].

28. The permittee will maintain monthly records to demonstrate compliance with Specific Condition #26. The permittee will update the records by the fifteenth day of the month following the month. The permittee will keep the records onsite, and make the records available to Department personnel upon request [[§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311].

Section V: COMPLIANCE PLAN AND SCHEDULE

Quebecor World, Inc. – Jonesboro Division does not currently have an enforcement action. Quebecor World, Inc. – Jonesboro Division will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

Section VI: Plant Wide Conditions

1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [§19.410(B) of Regulation 19 and , 40 CFR Part 52, Subpart E]

3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A.§8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

4. The permittee must provide: [§19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
   a. Sampling ports adequate for applicable test methods
   b. Safe sampling platforms
   c. Safe access to sampling platforms
   d. Utilities for sampling and testing equipment.

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation 19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Acid Rain (Title IV)

7. The Director prohibits the permittee to cause any emissions exceeding any allowances the source lawfully holds under Title IV of the Act or the regulations promulgated under the Act. No permit revision is required for increases in emissions allowed by allowances acquired pursuant to the acid rain program, if such increases do not require a permit revision under

any other applicable requirement. This permit establishes no limit on the number of allowances held by the permittee. However, the source may not use allowances as a defense for noncompliance with any other applicable requirement of this permit or the Act. The permittee will account for any such allowance according to the procedures established in regulations promulgated under Title IV of the Act. [Regulation no. 26 §26.701 of and 40 CFR 70.6(a)(4)]

Title VI Provisions

8. The permittee must comply with the standards for labeling of products using ozone depleting substances. [40 CFR Part 82, Subpart E]
    a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
    b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
    c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
    d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
9. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
    a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
    b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
    c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
    d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)
    e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
    f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
10. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
11. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle

air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

12. The permittee can switch from any ozone-depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program."

Section VII: Insignificant Activities

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated November 1, 2002.

Table 6 - Insignificant Activities

Description	Category
Natural Gas Fired Space Heating	Group B1
HVAC Sources	Group B2
Two Cooling Towers	Group A13
Prepress Sources (2 Film Processors; 2 Plate Processors; 1 Preheat Oven; 1 Postbake Oven; 1 Blueline Developer)	Group A13
LPG Storage & Naphthalene Storage	Group A13
Bindery Operations	Group A13
U.V. Coatings	Group A13

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

Section VIII:GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.[Pursuant to 40 CFR 70.6(b)(2)]

2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]

3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation #26 §26.406]

4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq*. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation #26 §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation #26 §26.701(C)(2)]
   a. The date, place as defined in this permit, and time of sampling or measurements;
   b. The date(s) analyses performed;
   c. The company or entity performing the analyses;
   d. The analytical techniques or methods used;
   e. The results of such analyses; and
   f. The operating conditions existing at the time of sampling or measurement.
6. The permittee must retain the records of all required monitoring data and support information for at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all

original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation #26 §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every 6 months. If the permit establishes no other reporting period, the reporting period will end on the last day of the anniversary month of this permit. The report is due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of dat The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation #26 §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b)]

   Arkansas Department of Environmental Quality
   Air Division
   ATTN: Compliance Inspector Supervisor
   Post Office Box 8913
   Little Rock, AR 72219

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. The permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:

   a. The facility name and location
   b. The process unit or emission source deviating from the permit limit,
   c. The permit limit, including the identification of pollutants, from which deviation occurs,
   d. The date and time the deviation started,
   e. The duration of the deviation,
   f. The average emissions during the deviation,
   g. The probable cause of such deviations,
   h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
   i. The name of the person submitting the report.

   The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report. [40 CFR 70.6(a)(3)(iii)(B), Regulation #26 §26.701(C)(3)(b), Regulation #19 §19.601 and §19.602]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5) and §26.701(E) of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]

10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. §26.701(F)(1)]

11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and §26.701(F)(2)]

12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation #26 §26.701(F)(3)]

13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation #26 §26.701(F)(4)]

14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation #26 §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation #19. [40 CFR 70.6(a)(7) and Regulation #26 §26.701(G)]

16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation #26 §26.701(H)]

17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation #26 §26.701(I)(1)]

18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation #26 §26.702(A) and (B)]

19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation #26 §26.2. [40 CFR 70.6(c)(1) and Regulation #26 §26.703(A)]

20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation #26 §26.703(B)]

    a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
    d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee will submit the compliance certification annually. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation #26 §26.703(E)(3)]

    a. The identification of each term or condition of the permit that is the basis of the certification;
    b. The compliance status;
    c. Whether compliance was continuous or intermittent;
    d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
    e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

22. Nothing in this permit will alter or affect the following: [Regulation #26 §26.704(C)]

    a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
    b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
    c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,

d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

23. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

APPENDIX A

AIR POLLUTION CONTROL

SYSTEM CONTINGENCY PLAN

APPENDIX B

Sample Recordkeeping for SN-14