

# ADEQ

ARKANSAS  
Department of Environmental Quality

July 9, 2009

David Hakenewerth  
Manager Engineering & Maintenance  
Quebecor World - Jonesboro Division  
4708 Krueger Drive  
Jonesboro, AR 72401

Dear Mr. Hakenewerth:

The enclosed Permit No. 0921-AOP-R6 is issued pursuant to the Arkansas Operating Permit Program, Regulation # 26.

After considering the facts and requirements of A.C.A. §8-4-101 et seq., and implementing regulations, I have determined that Permit No. 0921-AOP-R6 for the construction, operation and maintenance of an air pollution control system for Quebecor World - Jonesboro Division to be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8.603, within thirty (30) days after service of this decision.

All persons submitting written comments during this thirty (30) day period, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by Regulation 8.603.

Sincerely,



Mike Bates  
Chief, Air Division



# ADEQ OPERATING AIR PERMIT

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

Permit No. : 0921-AOP-R6  
Renewal #2  
IS ISSUED TO:

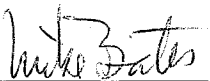
Quebecor World - Jonesboro Division  
4708 Krueger Drive  
Jonesboro, AR 72401  
Craighead County  
AFIN: 16-00181

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:

September 9, 2008      AND      September 8, 2013

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

  
\_\_\_\_\_  
Mike Bates  
Chief, Air Division

July 9, 2009  
\_\_\_\_\_  
Date Modified

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Quebecor World - Jonesboro Division  
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#### List of Acronyms and Abbreviations

|                  |   |
|------------------|---|
| A.C.A.           | Arkansas Code Annotated                     |
| AFIN             | ADEQ Facility Identification Number         |
| CFR              | Code of Federal Regulations                 |
| CO               | Carbon Monoxide                             |
| HAP              | Hazardous Air Pollutant                     |
| lb/hr            | Pound Per Hour                              |
| MVAC             | Motor Vehicle Air Conditioner               |
| No.              | Number                                      |
| NO <sub>x</sub>  | Nitrogen Oxide                              |
| PM               | Particulate Matter                          |
| PM <sub>10</sub> | Particulate Matter Smaller Than Ten Microns |
| SNAP             | Significant New Alternatives Program (SNAP) |
| SO <sub>2</sub>  | Sulfur Dioxide                              |
| SSM              | Startup, Shutdown, and Malfunction Plan     |
| Tpy              | Tons Per Year                               |
| UTM              | Universal Transverse Mercator               |
| VOC              | Volatile Organic Compound                   |

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**SECTION I: FACILITY INFORMATION**

PERMITTEE: Quebecor World - Jonesboro Division  
AFIN: 16-00181  
PERMIT NUMBER: 0921-AOP-R6  
FACILITY ADDRESS: 4708 Krueger Drive  
Jonesboro, AR 72401  
MAILING ADDRESS: 4708 Krueger Drive  
Jonesboro, AR 72401  
COUNTY: Craighead County  
CONTACT NAME: David Hakenewerth  
CONTACT POSITION: Manager Engineering & Maintenance  
TELEPHONE NUMBER: 870-333-2081  
REVIEWING ENGINEER: Ann Sudmeyer  
UTM North South (Y): Zone 15: 3965819.33 m  
UTM East West (X): Zone 15: 713349.99 m

## SECTION II: INTRODUCTION

### Summary of Permit Activity

Quebecor World – Jonesboro Division (AFIN: 16-00181) located at 4708 Krueger Drive, Jonesboro, AR 72401 operates a heatset, web offset lithographic printing facility. This permitting action is necessary to:

1. Permit up to six stitchers and/or perfect binders (adhesive bindery usage, SN-21) with up to six inkjet printers (SN-20) in the auxiliary building;
2. Increase the vinyl acetate content of the adhesive used at SN-19 and SN-21 from 0.05% to 0.5%;
3. Reduce the makeup solvent usage limit from 50,000 lb/yr to 30,800 lb/yr for the inkjet printers at SN-11;
4. Increase the adhesive usage (SN-19 and SN-21) from 4,020 lb/yr to 8,059.2 lb/yr; and
5. Permit the adhesive bindery operations (SN-19 and SN-21) to use non-VOC, non-HAP, and non-air contaminant containing adhesives without counting toward the adhesive usage limit.

The total permitted annual emission rate limit changes associated with this modification include: -0.09 tpy methanol and 0.02 tpy vinyl acetate.

### 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), bindery operations, and inkjet label printing.

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

The heatset web offset printing presses (SN-02, SN-03, SN-04, SN-05, SN-08, SN-10, SN-13, SN-15, SN-16, and SN-17) consist of unwind reel stands, six to nine print stations, natural gas fired dryers, chill stands and rollers, and folding equipment. Emissions of VOCs from the press dryers are controlled by one main afterburner system with two other systems available when the main afterburner is non-operational. The afterburner systems (SN-07, SN-09, and SN-18) 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 (paper), inks, blanket wash, fountain solution, and general cleaning solvent. 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 or reel 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 paper is printed on both sides before entering the dryer. The dryers are recirculating hot air systems fueled by natural gas. The dryers raise the web temperature to approximately 275°F. The ink used in the heatset printing dries very quickly with the volatile portions of the ink exhausted from the dryer to either an existing regenerative or alternate recuperative thermal oxidizer emission control devices. The web passes over chill rolls where it is cooled to about 20° 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 bindery 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 and SN-20) to print labels for direct mailing and shipping products. These emissions are non-point source since they do not exhaust through a process stack.

The facility also has emissions from the solvents and adhesives used (SN-12, SN-19, and SN-21).

### **Regulations**

The following table contains the regulations applicable to this permit.

| Regulations   |
|---|
| Arkansas Air Pollution Control Code, Regulation 18, effective January 25, 2009  |
| Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective January 25, 2009 |
| Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective January 25, 2009                     |
| 40 CFR Part 64 – Compliance Assurance Monitoring  |



### Emission Summary

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

| EMISSION SUMMARY          |                                |                      |                |   |
|---------------------------|--------------------------------|----------------------|----------------|---|
| Source Number             | Description                    | Pollutant            | Emission Rates |   |
|                           |                                |                      | lb/hr          | tpy   |
| Total Allowable Emissions |                                | PM                   | 0.8            | 3.2   |
|                           |                                | PM <sub>10</sub>     | 0.8            | 3.2   |
|                           |                                | SO <sub>2</sub>      | 0.1            | 0.3   |
|                           |                                | VOC                  | 124.7          | 249.6   |
|                           |                                | CO                   | 8.1            | 35.1  |
|                           |                                | NO <sub>x</sub>      | 9.6            | 41.8  |
| HAPs                      |                                | Glycol Ethers*       | 9.92           | 17.54   |
|                           |                                | Methanol*            | 17.45          | 31.71   |
|                           |                                | Naphthalene*         | 4.48           | 19.62   |
|                           |                                | Vinyl Acetate*       | 0.03           | 0.04  |
|                           |                                | Xylene*              | 3.40           | 6.35  |
| SN-01                     | Harris M-1000 Press No. 922    | Removed from Service |                |   |
| SN-02                     | Harris M-1000B Press No. 822-2 | VOC                  | 3.8            | 134.7 <sup>a</sup><br>16.73 <sup>a</sup><br>6.29 <sup>a</sup> |
|                           |                                | Glycol Ethers        | 0.50           |   |
|                           |                                | Xylene               | 0.18           |   |
| SN-03                     | APV Baker G-14 Press No. 822-3 | VOC                  | 5.3            |   |
|                           |                                | Glycol Ethers        | 0.70           |   |
|                           |                                | Xylene               | 0.25           |   |
| SN-04                     | APV Baker G-14 Press No. 822-4 | VOC                  | 4.7            |   |
|                           |                                | Glycol Ethers        | 0.62           |   |
|                           |                                | Xylene               | 0.22           |   |
| SN-05                     | Harris M-1000 Press No. 822-1  | VOC                  | 2.5            |   |
|                           |                                | Glycol Ethers        | 0.33           |   |
|                           |                                | Xylene               | 0.12           |   |
| SN-08                     | Harris M-1000 Press No. 822-5  | VOC                  | 7.5            |   |
|                           |                                | Glycol Ethers        | 1.00           |   |
|                           |                                | Xylene               | 0.35           |   |
| SN-10                     | Harris M-1000 Press No. 822-6  | VOC                  | 6.9            |   |
|                           |                                | Glycol Ethers        | 0.78           |   |
|                           |                                | Xylene               | 0.33           |   |
| SN-13                     | Harris M-1000B Press No. 822-7 | VOC                  | 7.4            |   |
|                           |                                | Glycol Ethers        | 0.94           |   |
|                           |                                | Xylene               | 0.35           |   |

| EMISSION SUMMARY              |   |                                     |                |                   |
|-------------------------------|---|-------------------------------------|----------------|-------------------|
| Source Number                 | Description                                       | Pollutant                           | Emission Rates |                   |
|                               |   |                                     | lb/hr          | tpy               |
| SN-15                         | MAN Roland Rotoman<br>64 Press No. 822-8          | VOC                                 | 13.3           |                   |
|                               |   | Glycol Ethers                       | 1.82           |                   |
|                               |   | Xylene                              | 0.61           |                   |
| SN-16                         | MAN Roland Rotoman<br>64 Press No. 822-9          | VOC                                 | 13.3           |                   |
|                               |   | Glycol Ethers                       | 1.82           |                   |
|                               |   | Xylene                              | 0.61           |                   |
| SN-17                         | Harris M-1000B Press<br>No. 822-10                | VOC                                 | 7.4            |                   |
|                               |   | Glycol Ethers                       | 0.94           |                   |
|                               |   | Xylene                              | 0.35           |                   |
| SN-07,<br>SN-09, and<br>SN-18 | Afterburner No. 1, No. 2,<br>and No. 3            | PM                                  | 0.8            | 3.2               |
|                               |   | PM <sub>10</sub>                    | 0.8            | 3.2               |
|                               |   | SO <sub>2</sub>                     | 0.1            | 0.3               |
|                               |   | VOC                                 | 29.8           | 61.1              |
|                               |   | CO                                  | 8.1            | 35.1              |
|                               |   | NO <sub>x</sub>                     | 9.6            | 41.8              |
|                               |   | Glycol Ethers                       | 0.47           | 0.81              |
| Xylene                        | 0.03  | 0.06                                |                |                   |
| SN-14                         | Press<br>No. 822-8                                | Not Installed - Removed from Permit |                |                   |
| SN-11                         | Ink Jet Printer Emissions<br>(Main Building)      | VOC                                 | 12.3           | 22.2              |
|                               |   | Methanol                            | 12.21          | 22.18             |
| SN-12                         | Press Room Emissions                              | VOC                                 | 5.0            | 21.9              |
|                               |   | Naphthalene                         | 4.48           | 19.62             |
|                               |   | Vinyl Acetate                       | 0.01           | 0.01              |
| SN-19                         | Adhesive Bindery<br>(Main Building)               | VOC                                 | 0.1            | 0.1 <sup>b</sup>  |
|                               |   | Vinyl Acetate                       | 0.01           | 0.03 <sup>b</sup> |
| SN-21                         | Adhesive Bindery<br>(Auxiliary Building)          | VOC                                 | 0.1            |                   |
|                               |   | Vinyl Acetate                       | 0.01           |                   |
| SN-20                         | Ink Jet Printer Emissions<br>(Auxiliary Building) | VOC                                 | 5.3            | 9.6               |
|                               |   | Methanol                            | 5.24           | 9.53              |

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

- a. Combined annual limit for SN-02, SN-03, SN-04, SN-05, SN-08, SN-10, SN-13, SN-15, SN-16, and SN-17.
- b. Combined annual limit for SN-19 and SN-21.

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### **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 an afterburner system is down for emergency repairs. The emission limits were identical to the previous permit.

0921-AOP-R3 was issued to Quebecor World – Jonesboro Division on June 6, 2003. This permit modification was issued as the first Title V renewal for the facility. The modification also

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allowed the addition of a new press (SN-14). Emission limits were: PM/PM<sub>10</sub> – 2.1 tpy, SO<sub>2</sub> – 0.2 tpy, VOC – 298.9 tpy, CO – 22.6 tpy, NO<sub>x</sub> – 26.9 tpy, R.T. 1.0 HAP – 78.8 tpy, R.T. 0.1 HAP – 0.01 tpy, and Glycol Ethers – 12.61 tpy.

0921-AOP-R4 was issued to Quebecor World – Jonesboro Division on October 21, 2005. This permit modification was issued for a facility expansion. The facility proposed to install 3 new presses (SN-15, SN-16, and SN-17) and to install a relocated regenerative thermal oxidizer (SN-18) which was sized to control the emissions from all of the presses. The existing oxidizers remained in place and operable and were used to control the facility at a reduced operating rate when the new oxidizer is off line. All emission limits were recalculated based on higher destruction efficiencies in the new oxidizer, successfully stack testing the existing oxidizers at a higher efficiency, and some material usage limits were reduced. The printing press authorized by the previous permit modification (SN-14) was not installed and was removed from the permit. Emission limits were: 3.3 tpy PM/PM<sub>10</sub>, 0.3 tpy SO<sub>2</sub>, 248.3 tpy VOC, 36.1 tpy CO, 42.9 tpy NO<sub>x</sub>, 15.39 tpy glycol ethers, 58.02 tpy RT 1.0 HAP, and 0.01 tpy RT 0.1 HAP.

0921-AOP-R5 was issued on September 9, 2008. This permitting action was necessary to: renew the facility's Title V air permit; remove SN-01; decrease the annual throughput of the ink used at the presses from 13,200,000 lb/yr to 10,500,000 lb/yr; increase the annual throughput of the automatic blanket wash used at the presses from 70,000 lb/yr to 160,000 lb/yr; decrease the annual throughput of the manual blanket wash used at the presses from 300,000 lb/yr to 282,000 lb/yr; decrease the annual throughput of the fountain solution used at the presses from 700,000 lb/yr to 480,000 lb/yr; increase the glycol ether content of the fountain solution used at the presses from 9% to 15%; increase the annual throughput of the ink used at SN-11 from 7,314 lb/yr to 7,400 lb/yr; increase the annual throughput of the wash used at SN-11 from 7,314 lb/yr to 7,400 lb/yr; increase the VOC content of the ink used at SN-11 from 80% to 83%; increase the HAP content of the ink used at SN-11 from 80% to 83%; increase the VOC content of the miscellaneous solvents used at SN-12 from 97% to 100%; permit adhesive bindery operations (SN-19); and revise the insignificant activities list. The total permitted annual emission rate limit decreases associated with this modification included: 0.1 tons per year (tpy) PM/PM<sub>10</sub>, 1.0 tpy CO, 1.1 tpy NO<sub>x</sub>, 0.25 tpy Relative Toxicity (RT) 1.0 HAPs (includes methanol, naphthalene, and xylene). The total permitted annual emission rate limit increases associated with this modification included: 1.3 tpy VOC, 2.15 tpy glycol ethers, and 0.01 tpy RT 0.1 HAPs (includes vinyl acetate).

**SECTION IV: SPECIFIC CONDITIONS**

SN-02, SN-03, SN-04, SN-05, SN-08, SN-10, SN-13, SN-15, SN-16, and SN-17  
 Printing Presses

Source Description

There are ten heatset web offset printing presses installed 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 the afterburners with only the non-stack emissions going directly to the atmosphere. These emissions are the non-stack emissions from the presses.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #3, #4, and #6. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

| Source No. | Description                           | Pollutant | lb/hr | tpy                |
|------------|---------------------------------------|-----------|-------|--------------------|
| SN-02      | Harris M-1000B Press No. 822-2        | VOC       | 3.8   | 134.7 <sup>a</sup> |
| SN-03      | APV Baker G-14 Press No. 822-3        | VOC       | 5.3   |                    |
| SN-04      | APV Baker G-14 Press No. 822-4        | VOC       | 4.7   |                    |
| SN-05      | Harris M-1000 Press No. 822-1         | VOC       | 2.5   |                    |
| SN-08      | Harris M-1000 Press No. 822-5         | VOC       | 7.5   |                    |
| SN-10      | Harris M-1000 Press No. 822-6         | VOC       | 6.9   |                    |
| SN-13      | Harris M-1000B Press No. 822-7        | VOC       | 7.4   |                    |
| SN-15      | MAN Roland Rotoman 64 Press No. 822-8 | VOC       | 13.3  |                    |
| SN-16      | MAN Roland Rotoman 64 Press No. 822-9 | VOC       | 13.3  |                    |
| SN-17      | Harris M-1000B Press No. 822-10       | VOC       | 7.4   |                    |

- a. Combined annual limit for SN-02, SN-03, SN-04, SN-05, SN-08, SN-10, SN-13, SN-15, SN-16, and SN-17.

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #3, #4, and #7. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Source No. | Description                    | Pollutant     | lb/hr | tpy                                     |
|------------|--------------------------------|---------------|-------|---|
| SN-02      | Harris M-1000B Press No. 822-2 | Glycol Ethers | 0.50  | 16.73 <sup>a</sup><br>6.29 <sup>a</sup> |
|            |                                | Xylene        | 0.18  |   |
| SN-03      | APV Baker G-14 Press No. 822-3 | Glycol Ethers | 0.70  |   |
|            |                                | Xylene        | 0.25  |   |

| Source No. | Description                           | Pollutant     | lb/hr | tpy |
|------------|---------------------------------------|---------------|-------|-----|
| SN-04      | APV Baker G-14 Press No. 822-4        | Glycol Ethers | 0.62  |     |
|            |                                       | Xylene        | 0.22  |     |
| SN-05      | Harris M-1000 Press No. 822-1         | Glycol Ethers | 0.33  |     |
|            |                                       | Xylene        | 0.12  |     |
| SN-08      | Harris M-1000 Press No. 822-5         | Glycol Ethers | 1.00  |     |
|            |                                       | Xylene        | 0.35  |     |
| SN-10      | Harris M-1000 Press No. 822-6         | Glycol Ethers | 0.78  |     |
|            |                                       | Xylene        | 0.33  |     |
| SN-13      | Harris M-1000B Press No. 822-7        | Glycol Ethers | 0.94  |     |
|            |                                       | Xylene        | 0.35  |     |
| SN-15      | MAN Roland Rotoman 64 Press No. 822-8 | Glycol Ethers | 1.82  |     |
|            |                                       | Xylene        | 0.61  |     |
| SN-16      | MAN Roland Rotoman 64 Press No. 822-9 | Glycol Ethers | 1.82  |     |
|            |                                       | Xylene        | 0.61  |     |
| SN-17      | Harris M-1000B Press No. 822-10       | Glycol Ethers | 0.94  |     |
|            |                                       | Xylene        | 0.35  |     |

a. Combined annual limit for SN-02, SN-03, SN-04, SN-05, SN-08, SN-10, SN-13, SN-15, SN-16, and SN-17.

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 current plan is included as Appendix A. [§18.1004 of Regulation 18, §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 usage limits per consecutive 12 month period. [§18.1004 of Regulation 18, §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]

| Material               | Maximum Usage Limit (lbs) |
|------------------------|---------------------------|
| Ink                    | 10,500,000                |
| Automatic Blanket Wash | 160,000                   |
| Manual Blanket Wash    | 282,000                   |
| Fountain Solution      | 480,000                   |

5. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #4. 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. These records shall

include the 12-month rolling totals and each individual month's data. A semi-annual report containing this information shall be submitted to the Department in accordance with General Provision #7. [§18.1004 of Regulation 18; §19.705 of Regulation 19; 40 CFR Part 52, Subpart E; and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

6. The permittee shall not exceed the following VOC content limits. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§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]

| Material                      | Maximum VOC Content<br>(% by weight) |
|-------------------------------|--------------------------------------|
| Ink                           | 45                                   |
| Blanket Wash                  | 100                                  |
| Fountain Solution Concentrate | 22.5                                 |

7. The blanket wash and fountain solution shall only contain those hazardous air pollutants listed in the following table. The blanket wash and fountain solutions shall not exceed the HAP content limits listed in the following table. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| Material          | HAP           | Maximum HAP Content<br>(% by weight) |
|-------------------|---------------|--------------------------------------|
| Blanket Wash      | Glycol Ethers | 5                                    |
|                   | Xylene        | 5.3                                  |
| Fountain Solution | Glycol Ethers | 15                                   |

SN-07, SN-09, and SN-18  
 Afterburners No. 1, No. 2, and No. 3

Source Description

Afterburners No. 1 and No. 2 are Katec Model No. 2016 recuperative thermal oxidation systems and Afterburner No. 3 is an Eisenmann Regenerative Thermal Oxidizer. The Katec Model No. 2016 recuperative thermal oxidation systems have a tested efficiency of 97% and the Eisenmann Regenerative Thermal Oxidizer has a 97% rated efficiency by its manufacturer. Stack emissions from the printing presses are routed through the Eisenmann Regenerative Thermal Oxidizer afterburner during normal operation and the alternate operating scenario is to operate the Katec Model No. 2016 recuperative thermal oxidation systems with a reduced number of presses operating.

Specific Conditions

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #4, #6, #11, #13, #14, and #15. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant         | lb/hr | tpy  |
|-------------------|-------|------|
| PM <sub>10</sub>  | 0.8   | 3.2  |
| SO <sub>2</sub>   | 0.1   | 0.3  |
| VOC <sub>gc</sub> | 0.6   | 2.3  |
| VOC <sub>p</sub>  | 29.2  | 58.8 |
| CO                | 8.1   | 35.1 |
| NO <sub>x</sub>   | 9.6   | 41.8 |

VOC<sub>gc</sub> – volatile organic compounds as the result of natural gas combustion

VOC<sub>p</sub> – volatile organic compounds as the result of printing

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #4, #7, #11, and #15. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM        | 0.8   | 3.2 |



| Pollutant     | lb/hr | tpy  |
|---------------|-------|------|
| Glycol Ethers | 0.47  | 0.81 |
| Xylene        | 0.03  | 0.06 |

10. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. The permittee shall use only natural gas (utility natural gas or LPG) to fire the afterburner in order to assure compliance with this opacity limit.

| SN    | Limit | Regulatory Citation                 |
|-------|-------|-------------------------------------|
| SN-07 | 5%    | §18.501 of Regulation 18 and A.C.A. |
| SN-09 | 5%    | §18.501 of Regulation 18 and A.C.A. |
| SN-18 | 5%    | §18.501 of Regulation 18 and A.C.A. |

11. Thermal Afterburner No. 1, No. 2, and No. 3 (SN-07, SN-09, and SN-18) shall be equipped with a temperature controller which monitors, records, and controls the operating temperature at or above 1300°Fahrenheit any time a press controlled by the afterburner is operating. [§18.1004 of Regulation 18, §19.304 and §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 40 CFR Part 64, and 40 CFR 70.6]
12. The permittee shall comply with all applicable provisions of Compliance Assurance Monitoring, including but not limited to: [§19.304 of Regulation 19 and 40 CFR Part 64]
- a. Indicator: The permittee shall monitor the temperature at SN-07, SN-09, and SN-18. [40 CFR Part §64.6(c)(1)(i)]
  - b. Indicator Range and Averaging Period: The permittee shall continuously maintain the temperature at or above 1300°Fahrenheit. [40 CFR Part §64.6(c)(2)]
  - c. Measurement Approach: The afterburners shall be equipped with electronic pen charts. [40 CFR Part §64.6(c)(1)(ii)]
  - d. Data Representativeness: The permittee shall measure the temperature at a location such that the readings are representative of the afterburner operation temperature. [40 CFR Part §64.6(c)(1)(iii)]
  - e. QA/QC and Frequency of Monitoring: The permittee shall follow the manufacturer's recommendations for quality assurance and control. The temperature shall be monitored continuously. [40 CFR Part §64.6(c)(1)(iii) and §64.3(b)(4)]
  - f. A monitoring report shall be submitted to the Department in accordance with General Provision #7 and shall include the following per 40 CFR §64.9(a)(2): [40 CFR Part §64.9(a)(1)]

- i. The information required under 40 CFR §70.6(a)(3)(iii);
  - ii. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
  - iii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
  - iv. A description of the actions taken to implement a QIP, if required, during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.
13. The permittee shall measure the VOC emissions from afterburners No. 1, No. 2, and No. 3 (SN-07, SN-09, and SN-18) once every 5 years using EPA Reference Method 25A 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% of maximum facility production as established in the testing protocol. Emission results shall be extrapolated to correlate with 100% of the permitted capacity to determine compliance. The presses shall be operating normally during that period. The testing shall be conducted in accordance with Plantwide Condition #3. [§19.702 of Regulation 19 and 40 CFR Part 52, Subpart E]
14. The permittee shall measure the initial VOC emissions from the new afterburner (SN-18) using EPA Reference Method 25A 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% of maximum facility production as established in the testing protocol. The presses shall be operating normally during that period. The test shall be completed in the time frame specified in Plantwide Condition #3. This initial testing was conducted on April 13, 2006. [§19.702 of Regulation 19 and 40 CFR Part 52, Subpart E].

ALTERNATE OPERATING SCENARIO:

15. The permittee shall keep a log of presses operating and afterburners operating along with a summation of the rated capacity of the presses operating and afterburners operating when operating under the alternate operating scenario (SN-18 out of service and SN-07 and/or SN-09 operating). Operation of press capacity in excess of the afterburner capacity shall be considered a violation of this permit. [§18.1004 of Regulation 18; §19.705 of Regulation 19; A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311; 40 CFR Part 52, Subpart E; and 40 CFR 70.6]

SN-11 and SN-20  
 Ink Jet Printer Emissions (Main Building and Auxiliary Building)

Source Description

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

Specific Conditions

16. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #18, #20, and #22. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| SN | Pollutant | lb/hr | tpy  |
|----|-----------|-------|------|
| 11 | VOC       | 12.3  | 22.2 |
| 20 | VOC       | 5.3   | 9.6  |

17. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #18, #20, and #23. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| SN | Pollutant | lb/hr | tpy   |
|----|-----------|-------|-------|
| 11 | Methanol  | 12.21 | 22.18 |
| 20 | Methanol  | 5.24  | 9.53  |

18. Material usage in the ink jet printer operations at SN-11 shall not exceed those listed in the following table for any consecutive 12 month period. [§18.1004 of Regulation 18, §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 | Material Used  | Maximum Usage Limit (lbs) |
|----|----------------|---------------------------|
| 11 | Ink            | 7,400                     |
|    | Wash           | 7,400                     |
|    | Makeup Solvent | 30,800                    |

19. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #18. 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. These records shall include the 12-month rolling totals and each individual month's data. A semi-annual report containing this information shall be submitted to the Department in accordance with General Provision #7. [§18.1004 of Regulation 18; §19.705 of Regulation 19; A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311; and 40 CFR Part 52, Subpart E]
20. Material usage in the ink jet printer operations at SN-20 shall not exceed those listed in the following table for any consecutive 12 month period. [§18.1004 of Regulation 18, §19.405(B) and §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 | Material Used  | Maximum Usage Limit (lbs) |
|----|----------------|---------------------------|
| 20 | Ink            | 3,200                     |
|    | Wash           | 3,200                     |
|    | Makeup Solvent | 13,200                    |

21. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #20. 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. These records shall include the 12-month rolling totals and each individual month's data. A semi-annual report containing this information shall be submitted to the Department in accordance with General Provision #7. [§18.1004 of Regulation 18; §19.705 of Regulation 19; A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311; and 40 CFR Part 52, Subpart E]
22. The permittee shall not exceed the following VOC content limits at SN-11 or SN-20. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§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]

| Material       | Maximum VOC Content (% by weight) |
|----------------|-----------------------------------|
| Ink            | 83                                |
| Wash           | 100                               |
| Makeup Solvent | 100                               |

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23. The ink jet printer supplies used by the permittee shall only contain those hazardous air pollutants listed in the following table. These supplies shall not exceed the HAP content limits listed in the following table at SN-11 or SN-20. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| Material       | HAP      | Maximum HAP Content<br>(% by weight) |
|----------------|----------|--------------------------------------|
| Ink            | Methanol | 83                                   |
| Wash           | Methanol | 100                                  |
| Makeup Solvent | Methanol | 100                                  |

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

24. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #26 and #28. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| Pollutant | lb/hr | tpy  |
|-----------|-------|------|
| VOC       | 5.0   | 21.9 |

25. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #26 and #29. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| Pollutant     | lb/hr | tpy   |
|---------------|-------|-------|
| Naphthalene   | 4.48  | 19.62 |
| Vinyl Acetate | 0.01  | 0.01  |

26. 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. [§18.1004 of Regulation 18, §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]

| Material Used | Maximum Usage Limit (lbs) |
|---------------|---------------------------|
| Solvent       | 43,600                    |
| Adhesive      | 4,000                     |

27. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #26. 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. These records shall include the 12-month rolling totals and each individual month's data. A semi-annual report containing this information shall be submitted to the Department in accordance with General Provision #7. [§18.1004 of Regulation 18; §19.705 of Regulation 19; A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311; and 40 CFR Part 52, Subpart E]

28. The permittee shall not exceed the following VOC content limits at SN-12. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§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]

| Material | Maximum VOC Content<br>(% by weight) |
|----------|--------------------------------------|
| Solvent  | 100                                  |
| Adhesive | 1.1                                  |

29. The solvent and adhesive used by the permittee at SN-12 shall only contain those hazardous air pollutants listed in the following table. The solvents and adhesives shall not exceed the HAP content limits listed in the following table. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| Material | HAP           | Maximum HAP Content<br>(% by weight) |
|----------|---------------|--------------------------------------|
| Solvent  | Naphthalene   | 90                                   |
| Adhesive | Vinyl Acetate | 0.5                                  |

SN-19 and SN-21  
 Adhesive Bindery (Main Building and Auxiliary Building)

Source Description

SN-19 and SN-21 includes use of adhesive in the bindery operations.

Specific Conditions

30. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #32 and #35. [Regulation 19, §19.501 et seq. and 40 CFR Part 52, Subpart E]

| SN | Pollutant | lb/hr | tpy  |
|----|-----------|-------|------|
| 19 | VOC       | 0.1   | 0.1* |
| 21 | VOC       | 0.1   |      |

\*Annual limit for SN-19 and SN-21 combined.

31. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #32 and #36. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| SN | Pollutant     | lb/hr | tpy   |
|----|---------------|-------|-------|
| 19 | Vinyl Acetate | 0.01  | 0.03* |
| 21 | Vinyl Acetate | 0.01  |       |

\*Annual limit for SN-19 and SN-21 combined.

32. Except as allowed by Specific Condition #34, the usage of adhesives at SN-19 and SN-21 (combined) shall not exceed the limits listed in the following table per consecutive 12 month period. [§18.1004 of Regulation 18, §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]

| Material Used | Maximum Usage Limit (lbs) |
|---------------|---------------------------|
| Adhesive      | 8,059.2                   |

33. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #32. 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. These records shall include the 12-month rolling totals and each individual month's data. A semi-annual report containing this information shall be submitted to the Department in accordance with General Provision #7. [§18.1004 of Regulation 18; §19.705 of Regulation 19; A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311; and 40 CFR Part 52, Subpart E]

- 34. The permittee may use adhesives that do not contain any VOCs, HAPs, or air contaminants at SN-19 and SN-21 and not count these adhesives towards the usage restriction of Specific Condition #32. Material Safety Data Sheets or equivalent documentation shall be kept on site to document that any adhesive used under this specific condition does not contain any VOCs, HAPs, or air contaminants. [§18.1004 of Regulation 18, §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR 70.6]
- 35. The permittee shall not exceed the following VOC content limits at SN-19 or SN-21. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§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]

| Material | Maximum VOC Content<br>(% by weight) |
|----------|--------------------------------------|
| Adhesive | 1.1                                  |

- 36. The adhesive used by the permittee shall only contain those hazardous air pollutants listed in the following table. The adhesives shall not exceed the HAP content limits listed in the following table at SN-19 or SN-21. Material Safety Data Sheets or equivalent documentation shall be maintained on-site to demonstrate compliance with this specific condition. [§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

| Material | HAP           | Maximum HAP Content<br>(% by weight) |
|----------|---------------|--------------------------------------|
| Adhesive | Vinyl Acetate | 0.5                                  |

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## **SECTION V: COMPLIANCE PLAN AND SCHEDULE**

Quebecor World - 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: PLANTWIDE CONDITIONS

1. The permittee shall 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 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §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. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise 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 shall 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:
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms; and
  - d. Utilities for sampling and testing equipment.

[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]

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall 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 A.C.A. §8-4-304 and §8-4-311]

Title VI Provisions

7. 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.
  
8. 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.
  
9. 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.
  
10. 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.

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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.

11. 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.

**SECTION VII: INSIGNIFICANT ACTIVITIES**

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application received on December 13, 2007 and correspondence received on February 8, 2008; March 20, 2008; April 11, 2008; and May 5, 2008.

| Description   | Category  |
|---|---|
| Natural Gas Fired Space Heating   | B-2   |
| HVAC Sources  | B-2   |
| Air Conditioning Units  | B-2   |
| UV Coatings   | No emissions.<br>No regulated air pollutants.               |
| Prepress Area Sources: Two Film Processors, Two Plate Processors, One Preheat Oven, One Postbake Oven, One Blueline Developer | No emissions.<br>All vent inside and not to the atmosphere. |
| One LP Storage Tank   | No emissions.<br>Pressure vessel.                           |
| Various Maintenance and Parts Cleaning Operations which use Miscellaneous Cleaners throughout the Facility                    | No emissions.<br>All vent inside and not to the atmosphere. |
| One 2,585 gallon Naphthalene Storage Tank   | A-3   |
| Seven Cooling Towers  | A-13  |

## 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. [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)]
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.
  - 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.

[40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

6. The permittee must retain the records of all required monitoring data and support information for at least five (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 six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below:

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

[40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
  - a. For all upset conditions (as defined in Regulation 19, § 19.601), 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:
    - i. The facility name and location;
    - ii. The process unit or emission source deviating from the permit limit;
    - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
    - iv. The date and time the deviation started;
    - v. The duration of the deviation;
    - vi. The average emissions during the deviation;
    - vii. The probable cause of such deviations;
    - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
    - ix. The name of the person submitting the report.



The permittee shall 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.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

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), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §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 26, §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 Regulation 26, §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 9. [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 shall, 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 shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. 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 A.C.A. §8-4-304 and §8-4-311]
24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
  - a. Such an extension does not violate a federal requirement;
  - b. The permittee demonstrates the need for the extension; and
  - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Regulation 18, §18.314(A), Regulation 19, §19.416(A), Regulation 26, §26.1013(A), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

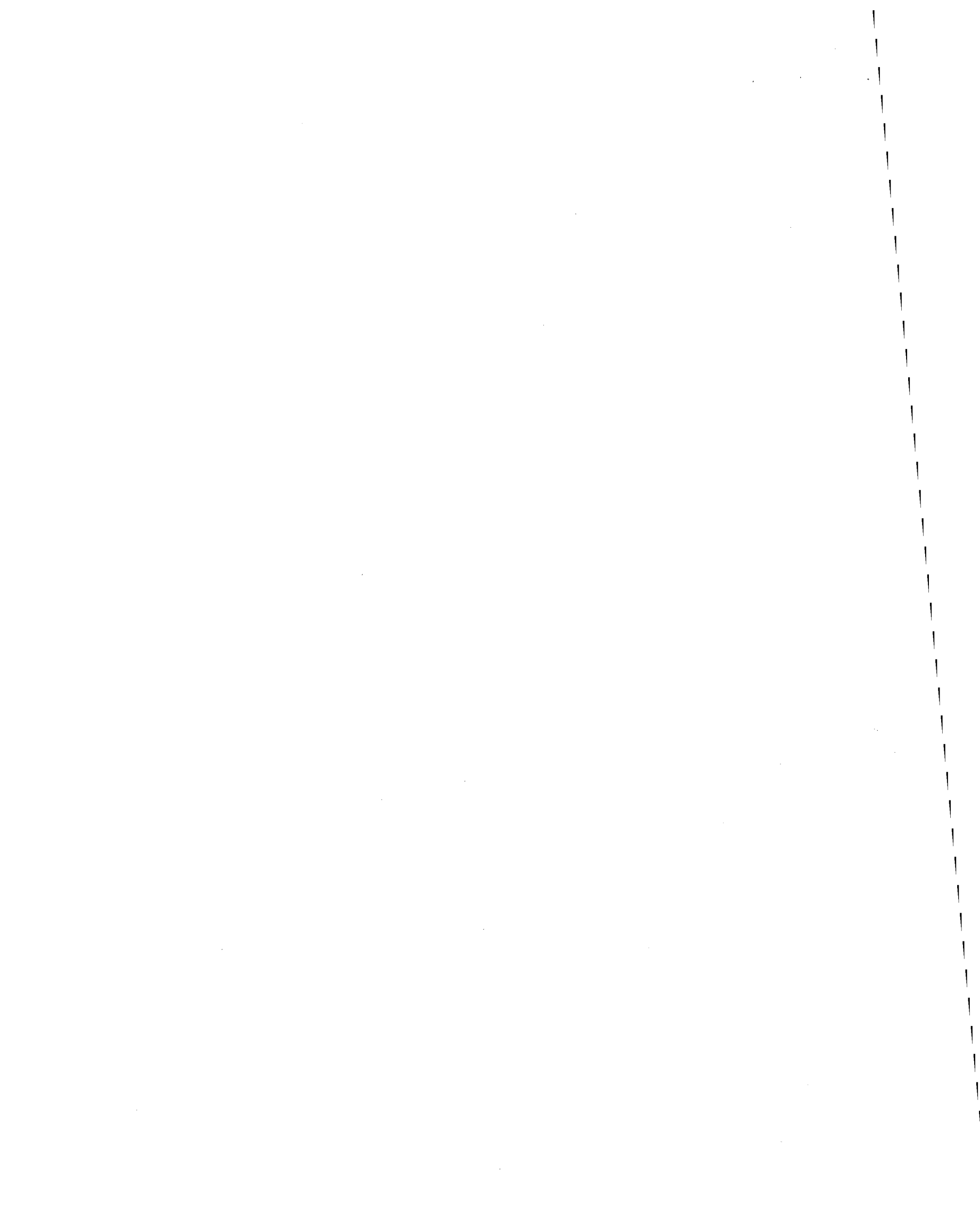
25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
- a. Such a request does not violate a federal requirement;
  - b. Such a request is temporary in nature;
  - c. Such a request will not result in a condition of air pollution;
  - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
  - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
  - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18, §18.314(B), Regulation 19, §19.416(B), Regulation 26, §26.1013(B), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
  - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
  - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18, §18.314(C), Regulation 19, §19.416(C), Regulation 26, §26.1013(C), A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

## APPENDIX A



**AIR POLLUTION CONTROL SYSTEM  
CONTINGENCY PLAN**

**QUEBECOR WORLD - JONESBORO DIVISION  
JONESBORO, ARKANSAS**

## 1. INTRODUCTION

Quebecor World - Jonesboro Division operates a heatset web offset printing facility and associated bindery operations. Printed materials include periodicals (monthly magazines) that must be delivered to customers on strictly adhered to schedules. An unexpected malfunction of the thermal oxidizer air pollution control system, because of the time sensitive nature of the materials printed by the Jonesboro Division, may require unavoidable brief periods of uncontrolled press operation to meet delivery schedules. The following Contingency Plan was developed to reduce the likelihood of an oxidizer malfunction, shorten the outage time caused by an unexpected malfunction, and minimize the potential impact to health and the environment that could result from uncontrolled press operation.



## 2. AIR POLLUTION CONTROL SYSTEM MAINTENANCE

The Jonesboro facility will maintain and monitor the performance of the oxidizer system with the following inspection and maintenance schedule that exceeds the manufacturer recommendations:

1. A visual annunciation system to be installed in the maintenance department, will provide the following information: Afterburner A Ready/Not Ready, Afterburner B Ready/Not Ready, Afterburner C Ready/Not Ready. This system will confirm the operation of the oxidizer units. An emergency blue strobe light, located in the electric maintenance shop, will be triggered and locked in if primary Afterburner C is not ready, and a press is not being controlled for more than 30 minutes. The alarm system can only be silenced by a shift supervisor, through a key lock.
2. The oxidizer units will be added to the guard's key punch list, so that daily visual inspection can be monitored and confirmed.
3. One day-shift machinist will be assigned to visually inspect the mechanical condition of the unit on a weekly basis. This inspection will consist of the main blower bearings, fan, and the valve linkages to the system.
4. A monthly inspection of the control chart will be performed by a plant electrician to verify that the chart recorder is properly recording the information and that the system is running within normal operating ranges.
5. A semi-annual systems check will be performed by the manufacturer to verify correct operating controls. This check will be a running inspection.
6. An annual inspection will be performed by the manufacturer.

A copy of the maintenance report from each routine maintenance and repair activity will be maintained for a period of five years and, if requested, made available to the ADEQ. In addition, a spare parts inventory will be maintained on-site to facilitate oxidizer system repair and minimize system outage time.

### 3. MALFUNCTION IMPACT MINIMIZATION

In the event of a malfunction of one or more of the facility's thermal oxidizer air pollution control systems, Jonesboro will proceed with the following measures to minimize the impact of this occurrence. The following measures and actions assume that limited uncontrolled press operation will be allowed for a 72-hour period following the malfunction incident, if the procedures outlined below are utilized by the Quebecor World Jonesboro facility.

#### 3.1. Immediately Following Malfunction

1. Complete safe shutdown of uncontrolled presses as soon as practical.
2. Start up one or more of the Katec oxidizers (A and/or B)
3. Contact maintenance personnel and the control system supplier as appropriate to initiate problem identification and repair.
4. Evaluate production scheduling, the need to complete time sensitive publications, and the availability of controlled presses to complete critical printing jobs. Re-assign presses and printing jobs to maximize use of controlled presses to complete critical jobs.
5. If uncontrolled press operation is required, contact ADEQ<sup>1</sup> as soon as practical for notification of the incident and the need for uncontrolled operation of presses.
6. If uncontrolled press operation is not required, contact ADEQ<sup>1</sup> within 48-hours of oxidizer malfunction to report the incident.

#### 3.2. Uncontrolled Press Operation: 24-Hour Period After Malfunction Occurrence

1. Expedite repair of the oxidizer system(s), using paid overtime for facility personnel, premium time for supplier's personnel, and rapid delivery of parts and supplies.
2. Develop, as soon as possible, an estimate of the expected duration of the malfunction outage. Communicate this schedule to ADEQ<sup>1</sup> and also notify

<sup>1</sup> ADEQ will be notified initially by telephone, if malfunction incident or the need for subsequent reporting occurs during normal ADEQ working hours. If a malfunction occurs outside of normal working hours, ADEQ will be notified by facsimile. Written notification no later than the day following the upset condition will be provided in any event.

ADEQ of the intent to operate certain critical presses uncontrolled to complete time sensitive printing.

3. Refuse new printing work from other Quebecor World facilities that would require or increase the use of uncontrolled presses. Also, refuse new, non-contract work from customers.
4. Minimize, to the extent possible, the use of VOC containing clean-up materials.

### **3.3. Uncontrolled Press Operation: 24 to 72-Hour Period Following Malfunction Incident**

In addition to the mitigating measures listed above, the Jonesboro Division will also take the following steps to reduce the potential impact of the malfunction incident:

1. Contact other Quebecor World facilities to determine if time sensitive printing work can be completed at other locations and shift work from uncontrolled presses to other locations, if feasible.
2. Update the oxidizer repair schedule, based on the best information currently available. Communicate updated repair schedule to ADEQ and notify ADEQ of the need to continue to operate certain presses uncontrolled to complete critical time sensitive printing.
3. Contact customers of printing work requiring uncontrolled press operation and explore the possibility of delivery delays to minimize uncontrolled operation time.



**CERTIFICATE OF SERVICE**

I, Pam Owen, hereby certify that a copy of this permit has been mailed by first class mail to

Quebecor World - Jonesboro Division, 4708 Krueger Drive, Jonesboro, AR, 72401, on this

9<sup>th</sup> day of July, 2009.

Pam Owen

Pam Owen, AAI, Air Division

