

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

MAR 11 2008

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CERTIFIED MAIL: 7004 1350 0003 1415 5247
RETURN RECEIPT REQUESTED

Mr. Vernon L. Robertson
General Manager
Walsworth Publishing Company - Finishing Plant
803 South Missouri Avenue
Marceline, Missouri, MO 64658

RE: Walsworth Publishing Company - Finishing Plant, 115-0001
Permit Number: OP2008-013

Dear Mr. Robertson:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission, P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the Administrative Hearing Commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the Administrative Hearing Commission.

If you have any questions or need additional information regarding this permit, please contact the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

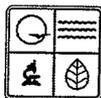


Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:dmn

Enclosure

c: Ms. Tamara Freeman, US Environmental Protection Agency Region VII
Northeast Regional Office
PAMS File: 2002-10-049



PART 70 PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Operating Permit Number: OP2008-013
Expiration Date: MAR 9 2013
Installation ID: 115-0001
Project Number: 2002-10-049

Installation Name and Address

Walsworth Publishing Company - Finishing Plant
803 South Missouri Avenue
Marceline, MO 64658
Linn County

Parent Company's Name and Address

Walsworth Publishing Company
306 North Kansas Avenue
Marceline, MO 64658

Installation Description:

Walsworth Publishing Company operates a yearbook printing installation located in Linn County.

MAR 10 2008

Effective Date

Steven J. Miller for JLA

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Walsworth Publishing Company operates a yearbook printing installation in Marceline, Missouri. The installation is currently using non-heatset, offset lithographic printers for the manufacture of yearbooks. Paper is fed into the machines and the appropriate ink and solvent combinations are applied. From there, the sheets are cut to the appropriate sizes, bound together by sewing, gluing or both and then packaged for shipping. The installation is an existing major source of volatile organic compounds (VOCs).

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2005	0.01	--	0.20	56.80	0.04	--	--
2004	0.01	--	0.20	65.47	0.04	--	--
2003	0.01	--	0.23	37.36	0.05	--	--
2002	0.01	--	0.19	36.24	0.04	--	0.64
2001	0.01	--	0.35	36.82	0.07	--	--

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
EU0010	Non-Heatset Sheet-Fed Printing Press #1
EU0020	Non-Heatset Sheet-Fed Printing Press #2
EU0030	Non-Heatset Sheet-Fed Printing Press #3
EU0040	Non-Heatset Sheet-Fed Printing Press #4
EU0050	Non-Heatset Sheet-Fed Printing Press
EU0060	Screen Press
EU0070	Heatset Web Printing Press
EU0080	Digital Press

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment which does not have unit specific limitations at the time of permit issuance.

Description of Emission Source

Film Cleaning (EP01)
 Eight - Miller TP-38A Non-Heatset Sheet-Fed Offset Lithographic Printing Presses (EP04)
 Komori Lithrone 40 L-440 (94 Model) Non-Heatset Sheet-Fed Offset Lithographic Printing Press (EP04)
 Miller 104B Non-Heatset Sheet-Fed Offset Lithographic Printing Press (EP04)
 Two Parts Washers
 Natural Gas Space Heaters (20) (EP20) – (0.966 MMBtu/hr total)
 Natural Gas Boiler (EP22) (0.4 MMBtu/hr)
 Three 165 Btu/hr (each) Natural Gas Hot Water Heaters
 Hot Melt Glue Application
 Miscellaneous Post-Press Activities (including finishing, assembly and binding of publications)

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Air Pollution Control Program Permit to Construct Number 0195-010
- 2) Air Pollution Control Program Permit to Construct Number 0195-011
- 3) Air Pollution Control Program Permit to Construct Number 042001-009
- 4) Air Pollution Control Program Permit to Construct Number 052001-004
- 5) Air Pollution Control Program Permit to Construct Number 062002-002
- 6) Air Pollution Control Program Permit to Construct Number 102002-002
- 7) Air Pollution Control Program Permit to Construct Number 102002-010
- 8) Air Pollution Control Program Permit to Construct Number 062003-022
- 9) Air Pollution Control Program Permit to Construct Number 012007-011

II. Plant Wide Emission Limitations

None

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0010 Non-Heatset Sheet-Fed Printing Press #1			
Emission Unit	Description	Manufacturer/Model #	2005 EIQ Reference #
EU0010	A 6-color non-heatset sheet-fed offset lithographic printing press; 20.60 lb/hr of ink, solvent and cleanup supplies; Installed 1995; WPC No. K-2	Komori Lithrone 40 Model L-640-III	EP04

Permit Condition EU0010-001

10 CSR 10-6.060

Construction Permits Required

APCP Permit to Construct Number 0195-010

Emission Limitations

This installation shall not emit more than 26.7 tons of volatile organic compounds (VOCs) in any consecutive 12-month period from this emission unit.

Equipment and Operation Parameters:

- 1) The fountain solution mixing tanks for alcohol-based solutions shall be covered at all times except when production, sampling, maintenance or inspection procedures require operator access.
 - a) Walsworth Publishing Company shall provide and maintain suitable, easily read, permanent markings on all mixing tanks used with this equipment.
 - b) These markings shall include the equipment serial number or a company equipment identification number that is unique to this equipment.
- 2) The cleanup solvents tanks shall be kept in sealed containers during transport and storage.
 - a) Walsworth Publishing Company shall provide and maintain suitable, easily read, permanent markings on all cleanup solvent containers used with this equipment.
 - b) These markings shall include the equipment serial number or a company equipment identification number that is unique to this equipment.
- 3) The cleaning cloths used with the cleanup solvents shall be placed in sealed containers when not in use and while awaiting off-site transportation.

Monitoring/Recordkeeping:

- 1) Monthly records shall be kept that list the VOC emissions from this emission unit. These records shall include the most recent 12-month total of VOC emissions and, at a minimum, VOC emissions data from the previous 24-month period.
- 2) Attachment A contains a log including the above record keeping requirements. This log, or an equivalent created by the permittee must be used to certify compliance with this requirement.
- 3) All records shall be maintained for five years.

Reporting:

The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

EU0020			
Non-Heatset Sheet-Fed Printing Press #2			
Emission Unit	Description	Manufacturer/Model #	2005 EIQ Reference #
EU0020	A 4-color non-heatset sheet-fed offset lithographic printing press; 20.60 lb/hr of ink, solvent and cleanup supplies; Installed 1995; WPC No. K-3	Komori Lithrone 40 Model L-440-III	EP04

Permit Condition EU0020-001

10 CSR 10-6.060

Construction Permits Required

APCP Permit to Construct Number 0195-011

Emission Limitations

This installation shall not emit more than 30 tons of volatile organic compounds (VOCs) in any consecutive 12-month period from this emission unit.

Equipment and Operation Parameters:

- 1) The fountain solution mixing tanks for alcohol-based solutions shall be covered at all times except when production, sampling, maintenance or inspection procedures require operator access.
 - a) Walsworth Publishing Company shall provide and maintain suitable, easily read, permanent markings on all mixing tanks used with this equipment.
 - b) These markings shall include the equipment serial number or a company equipment identification number that is unique to this equipment.
- 2) The cleanup solvents tanks shall be kept in sealed containers during transport and storage.
 - a) Walsworth Publishing Company shall provide and maintain suitable, easily read, permanent markings on all cleanup solvent containers used with this equipment.
 - b) These markings shall include the equipment serial number or a company equipment identification number that is unique to this equipment.
- 3) The cleaning cloths used with the cleanup solvents shall be placed in sealed containers when not in use and while awaiting off-site transportation.

Monitoring/Recordkeeping:

- 1) Monthly records shall be kept that list the VOC emissions from this emission unit. These records shall include the most recent 12-month total of VOC emissions and, at a minimum, VOC emissions data from the previous 24-month period.
- 2) Attachment B contains a log including the above record keeping requirements. This log, or an equivalent created by the permittee must be used to certify compliance with this requirement.
- 3) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 4) All records shall be maintained for five years.

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

EU0030 through EU0060
Non-Heatset Sheet-Fed Printing Presses
UV Screen Press

Emission Unit	Description	Manufacturer/Model #	2005 EIO Reference #
EU0030	A 4-color non-heatset sheet-fed offset lithographic printing press with coater; 0.282 gallons/hr ink, solvent and cleanup supplies; Installed 2001; WPC No. K-4	Komori Lithrone 40 Model L-440 (94 Model)	EP04
EU0040	A 5-color non-heatset sheet-fed offset lithographic printing press with coater; 0.242 gallons/hr ink, solvent and cleanup supplies; Installed 2001; WPC No. K-5	Komori Lithrone 40 Model L-440 (94 Model)	EP04
EU0050	A 8-color a non-heatset, offset lithographic press; of 0.484 gallons/hr of ink; WPC No. H-1	Heidelberg SM-102P	EP04
EU0060	An ultraviolet cylinder press with associated screen making equipment; 23.4 pounds/hr of coating; Installed 2002; WPC No. UV-1	Sakurai SC102 (2002 Model)	EP25

Permit Condition (EU0030 through EU0060)-001

10 CSR 10-6.060

Construction Permits Required

- Air Pollution Control Program Permit to Construct Number 042001-009
- Air Pollution Control Program Permit to Construct Number 052001-004
- Air Pollution Control Program Permit to Construct Number 102002-002
- Air Pollution Control Program Permit to Construct Number 062003-022
- Air Pollution Control Program Permit to Construct Number 012007-011

Emission Limitations/Equipment and Operation Parameters:

- 1) Walsworth Publishing Company shall keep the coatings, solvents and cleaning solutions in sealed containers whenever the materials are not in use.
- 2) Walsworth Publishing Company shall provide and maintain suitable, easily read, permanent markings on all coatings, solvent and cleaning solution containers used with this equipment.
- 3) Walsworth Publishing Company shall place the cleaning cloths/rags that are used on this equipment in sealed containers when not in use and while awaiting off-site transport.

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

EU0070 Heatset Web Printing Press			
Emission Unit	Description	Manufacturer/Model #	2005 EIQ Reference #
EU0070	A 6-color heatset web offset lithographic printing press; 8.172 gallons/hr of ink; 2.0 MMBtu/hr natural gas dryer; Installed 2002; WPC No. Web-1	Solna C96 (1980 Model)	EP24

<p align="center">Permit Condition EU0070-001</p> <p>10 CSR 10-6.060 Construction Permits Required Air Pollution Control Program Permit to Construct Number 062002-002</p>

Emission Limitations/Equipment and Operation Parameters:

- 1) Walsworth Publishing Company shall keep the coatings, solvents and cleaning solutions in sealed containers whenever the materials are not in use.
- 2) Walsworth Publishing Company shall provide and maintain suitable, easily read, permanent markings on all coatings, solvent and cleaning solution containers used with this equipment.
- 3) Walsworth Publishing Company shall place the cleaning cloths/rags that are used on this equipment in sealed containers when not in use and while awaiting off-site transport.

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

<p align="center">Permit Condition EU0070-002</p> <p>10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds</p>

Emission Limitation:

- 1) Emissions from any new source operation shall not contain more than 500 ppmv of sulfur dioxide on any consecutive three-hour time period.
- 2) Stack gasses shall not contain more than 35 mg per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three-hour time period.

Equipment and Operation Parameters:

This emission unit shall be limited to burning pipeline grade natural gas.

Monitoring/Record Keeping:

- 1) The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
- 2) All records shall be maintained for five years.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0080 Digital Press			
Emission Unit	Description	Manufacturer/Model #	2005 EIO Reference #
EU0080	A 4-color digital press to print short run books; 0.254 gallons/hr of toner; Installed 2002; WPC No. DP-1	HP Indigo 3000	EP26

Permit Condition EU0080-001
10 CSR 10-6.060 Construction Permits Required APCP Permit to Construct Number 102002-010

Emission Limitations/Equipment and Operation Parameters:

- 1) Walsworth Publishing Company shall keep the coatings, solvents and cleaning solutions in sealed containers whenever the materials are not in use.
- 2) Walsworth Publishing Company shall provide and maintain suitable, easily read, permanent markings on all coatings, solvent and cleaning solution containers used with this equipment.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which causes an exceedance of this regulation.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the EIQ form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-3.030 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Walsworth Publishing Company - Finishing Plant from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

This requirement is not federally enforceable.

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources' Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is 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 into 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 statement 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.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - 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 the 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.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) 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 system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065(6)(C)3 Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an 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 that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, 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 Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Environmental Protection Agency (EPA) Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The application requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.

- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the EPA and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected.

The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.

- b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Mr. Vernon L. Robertson, General Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Department of Natural Resources receives notice from the EPA that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) The Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

Attachments

Attachments follow.

Attachment B
Example VOC Emissions Compliance Sheet for EU0020

This attachment may be used to help meet the record keeping requirements of Permit Condition EU0020-001.

This sheet covers the month of _____ in the year _____.

Material Used	Amount of Material Used (gal)	Density (lb/gal)	VOC Content (weight %)	VOC Emissions (Tons)
Total VOC Emissions This Month (tons):				
12-Month Total VOC Emissions (tons):				

Instructions: The value of the last column (VOC Emissions) is calculated by multiplying the values in the previous three columns and dividing that product by 2000

Note: A 12-Month Total VOC Emissions of not more than 30 tons indicates compliance.

Attachment C
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds
Compliance Demonstration Summary

The following table demonstrates that the applicable limits of 10 CSR 10-6.260(3)(A) are met at all times by the Heatset Web Press when combusting natural gas.

Emission Unit	Emission Unit Description		¹ Calculated Maximum SO ₂ Emissions	SO ₂ Emissions Limit	¹ Calculated Maximum SO ₃ Emissions	SO ₃ Emissions Limit
EU0070	Heatset Web Press	Natural Gas	153 ppmv	500 ppmv	² Insignificant	35 mg/m ³

¹The supporting calculations and further detail can be found in the Statement of Basis of this permit.

²AP-42 has no emission factor for SO₃ in Table 1.4-2, as the natural gas emission factor for SO₂ is based on 100% fuel sulfur conversion to SO₂.

STATEMENT OF BASIS

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received October 7, 2002;
- 2) 2005 Emissions Inventory Questionnaire, received March 27, 2006;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Air Pollution Control Program Permit to Construct Number 042000-013;
- 5) Email correspondence from Scott Tuttle, Walsworth Publishing Company, dated March 31, 2003, July 16, 2003, and July 24, 2007.
- 6) Applicability Determination, APCP Project # 2005-12-026

Construction Permit History	
Permit No.	Description
0195-010	Addition of a Komori Lithrone Model L-640-III offset printing press
0195-011	Addition of a Komori Lithrone Model L-440-111 offset printing press.
042000-013	Addition of four (4) web presses
042001-009	Addition of a Komori Lithographic press with a coater.
052001-004	Addition of a five (5) color Komori Lithographic press with a coater.
062002-002	Installation of a six (6) color heat-set web press
102002-002	Installation of a Sakurai SC28/20II screen press with associated screen making equipment.
102002-010	Installation of a new HP-Indigo 3000 digital press to print short run books
062003-022	Modification of an existing Komori Press number K-5 and installation of four (4) Creo platemakers.
012007-011	Installation of one Heidelberg 8-color lithographic printing press

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

- 1) 10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*
Since 40 CFR Part 61 Subpart M has been deemed to apply to all installations as a core permit requirement, this rule also applies as a core permit requirement as it references 40 CFR Part 61 subparts.
- 2) 10 CSR 10-6.250, *Asbestos Abatement Projects - Certification, Accreditation and Business Exemption Requirements*
This rule has been deemed to be applicable to all installations and is, as such, included in the operating permit as a core permit requirement.

- 3) 10 CSR 10-6.280, *Compliance Monitoring Usage*
On past forms issued by the Air Pollution Control Program, including the application for this permit, this rule was automatically marked as an administrative rule not required to be listed as an applicable requirement. It is no longer judged to be solely administrative and is, therefore, included in the operating permit as a core permit requirement.
- 4) Title VI – 40 CFR Part 82, *Protection of Stratospheric Ozone*
The Air Pollution Control Program has deemed that this rule be included in all operating permits as a core permit requirement due to the nature of the requirements of the rule.
- 5) 40 CFR Part 68, *Chemical Accident Prevention Provisions*
The Air Pollution Control Program has deemed that this rule be included in all operating permits as a general permit requirement due to the nature of the requirements of the rule.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

- 1) 10 CSR 10-3.050, *Restriction of Emission of Particulate Matter from Industrial Processes*
This rule was rescinded on March 30, 2001, and replaced by 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*. 10 CSR 10-6.400 is also not included in the operating permit. AP-42 sections related to printing [Sections 4.9.1 (04/81) and 4.9.2 (04/81)] and federal air standards governing printing such as 40 CFR 60 Subpart QQ and 40 CFR 63 Subpart KK only address VOC and HAP emissions. None mention the emissions of particulate matter other than from the combustion of fuels used in heatset press dryers. The installation has one such dryer (EU0060). The dryer is direct-fired which is not specifically exempted by the rule, but since gaseous fuels are not to be included in the determination of process weight and there is no other source of particulate matter emissions, the rule was not included in the operating permit for this emission unit. It was also not included in the operating permit for the presses since they do not generate particulate matter emissions.
- 2) 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*
The only indirect heating units at the installation are considered insignificant sources as demonstrated below, and described later in the Statement of Basis as Emission Units Without Limitations, this rule is not included in the operating permit. As demonstrated by the following equation, it is highly unlikely that the natural gas heating units will exceed the applicable limits of this rule.

$$\text{Natural gas PM emission factor (lbs/MMBtu)} = \frac{7.6 \text{ lbs}/10^6 \text{ scf}}{1020 \text{ MMBtu}/10^6 \text{ scf}} = 7.45 \times 10^{-03} \text{ lb/MMBtu}$$

(AP - 42 Table 1.4 - 2(7/98))

The only applicable emission limit is §3.060(4)(A)1 of 0.6 lb/MMBtu, and as demonstrated above, the expected emission rate from the natural gas fired units are several orders of magnitude lower than the limit. Therefore, no unit specific requirements were included in this permit for this rule. . The heatset web press dryer (EU0070) is a direct-fired unit.

- 3) 10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminants*
This rule was rescinded on May 30, 2000, and replaced by 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*. 10 CSR 10-6.220 is not included in the operating permit since particulate matter emissions are not of significant quantity to result in opacity issues. See the discussion under why 10 CSR 10-3.050/6.400 was not included in the operating permit. In addition, based on a decision/agreement between EPA Region VII, Air Pollution Control Program Enforcement and Air Pollution Control Program Permitting, 10 CSR 10-6.220 is not being included in Title V Permits for natural gas or propane combustion units because by the nature of the fuel no opacity exceedances would ever be expected under normal operating conditions.
- 4) 10 CSR 10-3.100, *Restriction of Emission of Sulfur Compounds*; and
10 CSR 10-3.150, *Restriction of Emissions of Sulfur Compounds from Indirect Heating Sources*
These rules were rescinded on July 30, 1997, and replaced by 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*, which is included in the operating permit.
- 5) 10 CSR 10-6.060, *Construction Permits Required*
Air Pollution Control Program Permit to Construct Number 042000-013
This construction permit was not included in the operating permit since all four presses (M-25, M-36, M-38 and EP-23) to which the construction permit is applicable have been removed from service. The installation cannot re-install the presses without obtaining a new construction permit.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

- 1) Air Pollution Control Program Permit to Construct Numbers 0195-010 and 0195-011:
The wording of the reporting language in the construction permits was modified. However, the intent of the construction permit conditions remains the same.
- 2) Air Pollution Control Program Permit to Construct Numbers 042001-009, 052001-004, 062002-002, 102002-002, 102002-010, 062003-022, and 012007-011:
Reporting language was included in the event deviations occur.
- 3) Air Pollution Control Program Permit to Construct Numbers 042001-009
This permit was issued for a 6-color Komori Lithographic press. However, the installation chose to install a 4-color press (WPC Machine Number K-4) instead. The change has no effect on the special conditions of the permit.

NSPS Applicability

- 1) Currently, there are no 40 CFR Part 60 subparts that apply to the emission units covered under this permit.
- 2) 40 CFR Part 60 Subpart QQ, *Standards of Performance for the Graphics Art Industry: Publication Rotogravure Printing*, does not apply to the presses at this installation since none are rotogravure presses.

MACT Applicability

- 1) Currently, there are no 40 CFR Part 63 subparts that apply to the emission units covered under this permit.
- 2) 40 CFR Part 63 Subpart KK, *National Emission Standards for the Printing and Publishing Industry*, does not apply since the installation is not a major source of HAPs based on data contained in the 2001 EIQ and construction permits issued to the installation.

NESHAP Applicability

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*, applies to the installation because of the renovation and demolition parts of the subpart which makes the subpart applicable to all sources. It is included as a core permit requirement.

Other Regulatory Determinations

- 1) The following emission units were included in this operating permit as Emission Units Without Limitations. The reasons are briefly discussed in the following table.

Emission Unit Description	Explanation
Film Cleaning (EP01)	There are no specific regulations governing these emissions. Fugitive VOC emissions from this emission unit reported at a rate of 0.21 lbs/hr.
Miller TP-38A Non-Heatset Sheet-Fed Offset Lithographic Printing Presses (8) (EP04)	See table in item number #4 below.
Komori Lithrone 40 L-440 (94 Model) Non-Heatset Sheet-Fed Offset Lithographic Printing Press (EP04)	See table in item number #4 below.
5-color, Komori Lithrone 40 L-540 Non-Heatset Sheet-Fed Offset Lithographic Printing Press WPC No K-6 (EP04)	No Permit Required determination, APCP Project # 2005-12-026
Parts Washers (2)	Insignificant sources per policy
0.966 MMBtu/hr (total) Natural Gas Space Heaters (20) (EP20)	These emission units emit only products of combustion, each produce less than 150 pounds per day of any air contaminant and each have a heat input of less than 10 MMBtu/hr by using exclusively natural gas. The APCP has determined that it is not necessary to include units such as these in the operating permit.
0.4 MMBtu/hr Natural Gas Boiler (EP22)	See preceding explanation.
165 Btu/hr (each) Natural Gas Hot Water Heaters (3)	See preceding explanation.
Hot Melt Glue Application	VOC emissions are the only pollutants generated from this emission unit. Based on engineering judgment, emissions from these activities are negligible (< 0.5 lbs/hr) and are not subject to any specific regulations.

Emission Unit Description	Explanation
Miscellaneous Post-Press Activities (including finishing, assembly and binding of publications)	Based on engineering judgment, emissions from these activities are negligible and are not subject to any specific regulations.

1) This installation has both indirect-fired and direct-fired combustion units. The indirect-fired units are all considered Emission Units Without Limitations as explained above. The direct-fired unit is the dryer associated with the heatset web press (EU0060). This unit also only burns natural gas and has a heat input of less than 10 MMBtu/hr. However, since it is integral to the press, and emissions from its stack include those from both combustion and drying of the printing chemicals, it is included as part of emission unit EU0070. As such, any applicable requirements for natural gas combustion in direct-fired units are included in the operating permit.

2) Maximum Hourly Design Rates of Presses

An explanation of the determination of MHDRs for EU0010 through EU0070 is included below.

EU0010 and EU0020:

From 2002 data and EIQ:

Total impressions = 98,420,653

Total throughput of EP04 = 77.97 tons X 2000 lb/ton = 155,940 lb

Manufacturer's specified maximum cycle rate = 13,000 impressions (imp)/hr

MHDR per Emission Unit =

$(13,000 \text{ imp/hr}) \times (155,940 \text{ lb material/yr}) \div (98,420,653 \text{ imp/yr}) = 20.60 \text{ lb material usage/hr}$

EU0030: The MHDR reported in the review of Air Pollution Control Program Permit to Construct Number 042001-009 was used to describe the emission unit.

EU0040: The MHDR reported in the review of Air Pollution Control Program Permit to Construct Number 052001-004 was used to describe the emission unit.

EU0050: The MHDR reported in the review of Air Pollution Control Program Permit to Construct Number 012007-011 was used to describe the emission unit.

EU0060: Data included in the review of Air Pollution Control Program Permit to Construct Number 102002-002 was used to calculate the MHDR of the emission unit. The data and calculations follow.

One pound of coating will cover approximately 1000 ft².

Maximum sheet size = 7.8 ft².

Maximum cycle rate = 3000 sheets/hr

$\text{MHDR} = (3000 \text{ sheets/hr}) \times (7.8 \text{ ft}^2/\text{sheet}) \times (1 \text{ lb coating}/1000 \text{ ft}^2) = 23.4 \text{ lb coating/hr}$

EU0070: The MHDR reported in the review of Air Pollution Control Program Permit to Construct Number 062002-002 was used to describe the emission unit.

EU0080: The MHDR reported in the review of Air Pollution Control Program Permit to Construct Number 102002-010 was used to describe the emission unit.

3) 10 CSR 10-6.060, *Construction Permits Required*

As part of the operating permit review, the construction permitting status of each of the presses in use at the installation was evaluated. The table below includes a list of all presses currently at the installation that do not have construction permits on file with the Air Pollution Control Program and the reason each is not required to do so. A general summary of the reasons follows.

WPC Machine No.	No. of Colors	Manufacturer	Model No.	Serial No.	Year Installed	Reason for no APCP Construction Permit
TP-1	2	Miller	TP-38A (77 Model)	18480	Pre-82	Grandfathered Unit
TP-5	2	Miller	TP-38A (75 Model)	18020	Pre-82	Grandfathered Unit
TP-8	2	Miller	TP-104B (81 Model)	20601	1994	Installed prior to Installation's PTE Exceeding De Minimis Levels
TP-10	4	Miller	TP-38A (80 Model)	19413	Pre-82	Grandfathered Unit
TP-13	2	Miller	TP-38A	18869	2002	Like-Kind Replacement of a Grandfathered Unit (TP-6)
TP-16	2	Miller	TP-38A (79 Model)	18527	1994	Installed prior to Installation's PTE Exceeding De Minimis Levels
TP-18	4	Miller	TP-38A (81 Model)	19490	1994	Installed prior to Installation's PTE Exceeding De Minimis Levels
K-1	4	Komori Lithrone 40	L-440 (94 Model)	1041	1994	Installed prior to Installation's PTE Exceeding De Minimis Levels
K-6	5	Komori 540 Lithrone				No Permit Required, APCP Project # 2005-12-026
M-3	2	Miller	TP-38A (75 Model)	18025	1997	Like-Kind Replacement of a Grandfathered Unit (TP-3)
M-4	2	Miller	TP-38A (80 Model)	19521	1997	Like-Kind Replacement of a Grandfathered Unit (TP-4)

- a) The presses installed prior to May 13, 1982, are considered grandfathered emission units. The Air Pollution Control Program has determined that grandfathered emission units are exempt from construction permitting requirements.
- b) A couple of the presses were considered like-kind replacements of grandfathered units. Per 10 CSR 10-6.060(1)(E)3., these types of changes at an installation are considered exempt activities from construction permitting requirements.
- c) A construction permit for an emission unit is only required if the existing installation's potential to emit (PTE) is greater than de minimis levels. Several of the presses were added to Walsworth Publishing Company's operations after 1982 but before the installation's potential emissions exceeded de minimis levels. These presses would not have been required to be permitted prior to installation.

4) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

The only source of sulfur emissions from this installation is from the combustion of natural gas in space heaters, hot water heaters, a boiler and the dryer associated with the heatset web press (EU0070).

As discussed above, all of these units are considered Emission Units Without Limitations, except for the dryer. Since the dryer is considered part of a significant emission unit and is subject to this rule, the rule is being included in the operating permit. The dryer was installed after February 24, 1971, so the limits for new sources apply to this unit.

Supporting Calculations for Attachment C

For maximum SO₂ emissions from natural gas combustion in the heatset web press (ppmv):

$$\text{Natural gas SO}_2 \text{ emission factor - } EF_{SO_2} \text{ (lbs/MMBtu)} = \frac{0.6 \text{ lbs}/10^6 \text{ scf}}{1020 \text{ MMBtu}/10^6 \text{ scf}} = 5.88 \times 10^{-4} \text{ lb/MMBtu}$$

(AP - 42 Table 1.4 - 2(7/98))

$$\text{General Equation: } SO_2 \text{ (ppmv)} = \frac{EF_{SO_2}}{H_{fuel} \cdot F}, \text{ and using Conversion factor} = 1.66 \times 10^{-7} \text{ (lb/scf)/ppmv}^1$$

$$F = \frac{\text{gas volume of products of combustion}}{H_{fuel}} = 10,610 \text{ wscf/MMBtu}^2$$

$$\text{ppmv SO}_2 = \left(\frac{5.88 \times 10^{-4} \text{ lb}}{\text{MMBtu}} \right) \times \left(\frac{\text{MMBtu}}{10,610 \text{ wscf}} \right) \times \left(\frac{\text{ppmw}}{1.667 \times 10^{-7} \text{ lb/scf}} \right) \times \left(\frac{0.45 \text{ ppmv}}{\text{ppmw}} \right) = 153.3 \text{ ppmv}$$

AP-42 has no emission factor for SO₃ in Table 1.4-2, as the natural gas emission factor for SO₂ is based on 100% fuel sulfur conversion to SO₂.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

- 1) The specific pollutant regulated by that rule is not emitted by the installation;
- 2) The installation is not in the source category regulated by that rule;
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule;
- 4) The installation does not contain the type of emission unit which is regulated by that rule;
- 5) The rule is only for administrative purposes.

¹ 40 CFR Part 60 Appendix A Method 19

² 40 CFR Part 60 Appendix A Method 19 Tbl 19-1

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:



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