

STATE OF MISSOURI

PERMIT BOOK



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 122007-004 Project Number: 2007-09-012

Parent Company: Walsworth Publishing Company

Parent Company Address: 306 North Kansas Ave, Marceline, MO 64658

Installation Name: Walsworth Publishing Company

Installation Address: 803 South Missouri Ave., Marceline, MO 64658

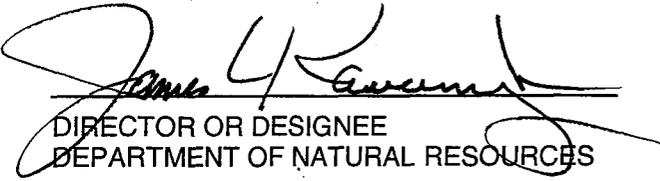
Location Information: Linn County, S29, T57N, R18W

Application for Authority to Construct was made for:
Installation of one Heidelberg 8-Color lithographic printing press. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

-
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

DEC 12 2007

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions 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 AHC within 30 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 choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

STATE OF MISSOURI



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Permit Number: Project Number: 2007-09-012

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Parent Company Address: 306 North Kansas Ave, Marceline, MO 64658

Installation Name: Walsworth Publishing Company

Installation Address: 803 South Missouri Ave., Marceline, MO 64658

Location Information: Linn County, S29, T57N, R18W

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Permit No.	
Project No.	2007-09-012

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Walsworth Publishing Company
Linn County, S29, T57N, R18W

1. Solvent/Ink Cloths
Walsworth Publishing Company shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. Walsworth Publishing Company shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2007-09-012
Installation ID Number: 115-0001
Permit Number:

Walsworth Publishing Company
803 South Missouri Ave.
Marceline, MO 64658

Complete: September 17, 2007
Reviewed: November 07, 2007

Parent Company:
Walsworth Publishing Company
306 North Kansas Ave.
Marceline, MO 64658

Linn County, S29, T57N, R18W

REVIEW SUMMARY

- Walsworth Publishing Company has applied for authority to install one Heidelberg 8-Color lithographic printing press (EP-4.H2).
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are xylene, cumene, and hexane.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment. 40 CFR Part 60 Subpart QQ, *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing*, does not apply since the presses in this installation do not fall under the definition of publication rotogravure printing press as described in this rule.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment. 40 CFR Part 63 Subpart KK, *National Emission Standards for the Printing and Publishing Industry*, does not apply since this installation is not a major source of HAP emissions.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.
- This installation is located in Linn County, an attainment area for all criteria air pollutants.

- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment.
- A revision to the Part 70 Operating Permit application is required for this installation within 1 year of equipment startup.

Approval of this permit is recommended with special conditions.

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.

A Part 70 Operating Permit application was received by the Air Pollution Control Program on October 7, 2002 and is currently on public notice. The following construction permits have been issued to Walsworth Publishing Company from the Air Pollution Control Program.

Permit Number	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.

PROJECT DESCRIPTION

Walsworth Publishing Company has applied for authority to install one Heidelberg 8-color lithographic printing press (EP-4.H2). This is a non-heatset, offset lithographic press. The maximum hourly design rate (MHDR) of 0.484 gallons of ink per hour is based on a maximum historical usage by a similar existing press. All other materials including the cleaner, blanket wash, ink additives, and fountain solutions are based on predetermined ratios of the particular material to the amount of ink used.

There are no control devices associated with the new press.

EMISSIONS/CONTROLS EVALUATION

A mass balance approach was used in the analysis of volatile organic compound (VOC) and HAP emissions. For the purpose of calculating potential emissions from this application, it was assumed that 100% of the VOCs and HAPs contained in the coatings were emitted as pollutants with the exception of the printing ink. According to a memorandum issued by the Director of the Air Pollution Control Program on April 27, 2005, 95% of the VOCs contained in non-heatset inks are assumed to be retained in the substrate with the remaining 5% emitted into the ambient air. The percentage of VOC and HAP by weight and densities of the coatings were determined from Material Safety Data Sheets (MSDS) provided by the applicant.

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Existing potential emissions were taken from a previous permit (Permit Number 012007-011). Existing actual emissions were taken from the 2006 Emissions Inventory Questionnaire (EIQ). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/D	0.01	N/A	N/A
SO _x	40.0	N/A	<0.01	N/A	N/A
NO _x	40.0	N/D	0.20	N/A	N/A
VOC	40.0	246.44	62.21	13.77	N/A
CO	100.0	N/D	0.04	N/A	N/A
HAPs	10.0/25.0	8.15	N/D	0.11	N/A
Hexane	10.0	0.15	N/D	0.01	N/A
Xylene	10.0	0.39	N/D	0.08	N/A
Cumene	10.0	0.09	N/D	0.03	N/A

N/A = Not Applicable; N/D = Not Determined

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.

APPLICABLE REQUIREMENTS

Walsworth Publishing Company shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits, 10 CSR 10-6.065*
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Restriction of Emission of Odors, 10 CSR 10-3.090*

AMBIENT AIR QUALITY IMPACT ANALYSIS

Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Samer Al-Shoukhi
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated September 05, 2007, received September 10, 2007, designating Walsworth Publishing Company as the owner and operator of the installation.
- Memorandum issued on April 27, 2005 from Missouri Department of Natural Resources, Air Pollution Control Program, *Retention Factors for Non-Heatset and Heatset Web Offset Lithographic Printing Inks for Actual and Potential Emissions Calculations*
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Northeast Regional Office Site Survey, dated October 02, 2007.
- Material Safety Data Sheets provided by the applicant.

Mr. Scott Tuttle
Engineer Technician
Walsworth Publishing Company
306 North Kansas Avenue
Marceline, MO 64658

RE: New Source Review Permit - Project Number: 2007-09-012

Dear Mr. Tuttle:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your revised operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to Mr. Samer Al-Shoukhi by telephone at (573) 751-4817, or you may write to the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Thank you,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:san

Enclosure

c: Northeast Regional Office
PAMS File 2007-09-012