

Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE 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.

Intermediate Operating Permit Number: OP2011-027
Expiration Date: JUN 02 2016
Installation ID: 051-0043
Project Number: 2008-03-080

Installation Name and Address

Command Web - Missouri
7100 One Color Way
Jefferson City, MO 65101
Cole County, S19, T44N, R10W

Parent Company's Name and Address

Command Web Offset Co., Inc
100 Castle Road
Secaucus, NJ 07096

Installation Description:

Command Web Offset Company, Inc. operates a lithographic printing plant in Jefferson City, Missouri. The installation has accepted a voluntary, federally enforceable emission limit of less than 100 tons of volatile organic compounds (VOCs) in any consecutive 12-month period to qualify for an Intermediate State Operating Permit.

JUN 03 2011

Effective Date

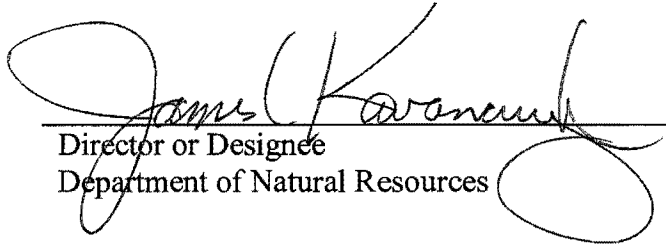

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Command Web Offset Company, Inc. operates a lithographic printing plant in Jefferson City, Missouri. The installation has accepted a voluntary, federally enforceable emission limit of less than 100 tons of volatile organic compounds (VOCs) in any consecutive 12-month period to qualify for an Intermediate State Operating Permit.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2009	2008	2007	2006	2005
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.3103	0.408	0.0266	0.0581	0.0733
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.3103	0.408	0.0266	0.0581	0.0733
Sulfur Oxides (SO _x)	0.0245	0.0322	0.002	0.0045	0.074
Nitrogen Oxides (NO _x)	4.0842	5.3671	0.3784	0.7816	0.8682
Volatile Organic Compounds(VOC)	18.2277	24.2182	45.591	61.5177	71.0057
Carbon Monoxide (CO)	3.34307	4.5084	0.3186	0.6551	0.7213
Lead (Pb)	----	----	----	----	----
Hazardous Air Pollutants (HAPs)	0	0	0	1.2243	2.311
Ammonia (NH ₃)	0	0	0	0	0

The installation emits HAPs and reports them as VOCs, in accordance with 10 CSR 10-6.110.

EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>	<u>2008 EIQ EP#</u>
EU0010	Web Press #1	EP-01
EU0020	Sheetfed Press #1	EP-02
EU0030	UV Coater #1	EP-03
EU0040	Web Press #2	EP-04
EU0050	Web Press #3	EP-07
EU0080	Web Press #4 with dryer afterburner	
EU0090	Sheetfed Press #2	

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	2008 EIQ EP#
Binding system #1, fugitive	EP-05
Binding system #2, fugitive	EP-06
Parts washer	

DOCUMENTS INCORPORATED BY REFERENCE

This permit incorporates the following documents by reference:

- 1) Missouri Department of Natural Resources Construction Permit 0194-007, issued January 3, 1994
- 2) Missouri Department of Natural Resources Construction Permit 1294-001, issued November 9, 1994
- 3) Missouri Department of Natural Resources Construction Permit 1096-017, issued October 23, 1996
- 4) Missouri Department of Natural Resources Construction Permit 012003-010, issued January 13, 2003
- 5) Missouri Department of Natural Resources Construction Permit 082010-005, issued August 06, 2010

II. Plant Wide 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 on the date of permit issuance.

PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

- 1) The permittee shall emit into the atmosphere less than 100 tons of volatile organic compounds (VOCs) from the entire installation in any consecutive 12-month period.
- 2) The permittee shall discharge less than ten tons of any individual hazardous air pollutant (HAP) into the atmosphere from the entire installation during any consecutive 12-month period.
- 3) The permittee shall discharge less than 25 tons of hazardous air pollutants (HAPs) in aggregate into the atmosphere from the entire installation during any consecutive 12-month period.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of VOCs and HAPs emitted into the atmosphere from the installation. Attachment A or an equivalent form approved by the Air Pollution Control Program shall be used for this purpose.
- 2) The permittee shall maintain on file material safety data sheets or other data sufficient to document the percent HAP constituents in the inks, solvents, and coatings.
- 3) Attachment A, Attachment B and Attachment C or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Emission Limitation 1 and 2.
- 4) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.

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 on the date of permit issuance.

EU0010 – WEB PRESS #1			
Emission Unit	Description	Manufacturer /Model #	2008 EIQ Reference #
EU0010	Web Press #1: one 4-unit (38 x 22 ¾) heatset web offset lithographic press with 4 webs and 2 natural gas-fired dryers (0.006 MMBtu/hr); MHDR 33,180 impressions/hr; 19.92 lb/hr; installed 1994	Heidelberg/ M-1000BE	EP-01

<p>PERMIT CONDITION EU0010-001 10 CSR 10-6.060 Construction Permits Required Construction Permit 0194-007, Issued January 3, 1994</p>
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Operational Limitation:

- 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. [CP 0194-007, Special Condition 2]
- 2) The cleanup solvents shall be kept in tightly covered tanks or containers during transport and storage. [CP 0194-007, Special Condition 3]
- 3) The cleaning cloths used with the cleanup solvents shall be placed in tightly closed containers when not in use and while awaiting off-site transportation. [CP 0194-007, Special Condition 4]

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’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

EU0020 – SHEETFED PRESS #1			
EU0030 – UV COATER #1			
Emission Unit	Description	Manufacturer /Model #	2008 EIQ Reference #
EU0020	Sheetfed Press #1: 6-unit (28 x 40) sheetfed lithographic press with infrared dryer and coating unit; MHDR 12,000 impressions per hour; 7.92 lb/hr; installed 1994	Heidelberg/ Speedmaster	EP-02
EU0030	UV Coater #1: ultra-violet coating machine; MHDR 4,500 impressions per hour; 19.00 lb/hr; installed 1994	Steinmann	EP-03

PERMIT CONDITION (EU0020 and EU0030)-001
10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring:

- 1) The permittee shall conduct opacity readings on these emission units using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) Note: Permit renewal or modification does not require the installation to revert to the weekly/bi-weekly opacity-monitoring schedule. If the permittee is currently performing semi-annual monitoring it may continue unless a violation is noted. The installation will only revert to weekly monitoring when a violation has been noted.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment D-1 or D-2), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment E)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment F)
- 4) Attachments D-1, D-2, E and F contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, must be used to certify compliance with this requirement.
- 5) All records shall be maintained for five (5) years. They shall be kept onsite for at least two (2) years. They may be kept in either hard-copy form or on computer media.

- 6) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

EU0040 – WEB PRESS #2			
Emission Unit	Description	Manufacturer /Model #	2008 EIQ Reference #
EU0040	Web Press #2: one 2-unit (37.5 x 22.4) heatset web offset lithographic press with 2 webs and 2 natural gas-fired dryers (0.006 MMBtu/hr); MHDR 25,000 impressions/hr; 9.2 lb/hr; installed 1996	Heidelberg/ M-1000A	EP-04

PERMIT CONDITION EU0040-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 1096-017, Issued October 23, 1996

Operational Limitation:

This facility shall utilize good housekeeping and safety practices in the use and storage of inks, solvents, and coatings. Cleanup solvents and used cloths shall be kept in tightly covered containers when not in use, or awaiting off-site transport. [CP 1096-017, Special Condition 5]

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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

EU0050 – WEB PRESS #3			
Emission Unit	Description	Manufacturer /Model #	2008 EIQ Reference #
EU0050	Web Press #3: one 4-unit (4-color) heatset web offset lithographic press with one natural gas-fired dryer (0.006 MMBtu/hr); MHDR 33,180 impressions per hour; 38.34 lb/hr; equipped with regenerative thermal oxidizer; installed 2003	Goss- Heidelberg/ Sunday 2000	EP-07

PERMIT CONDITION EU0050-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 012003-010, Issued January 13, 2003

Operational Limitation:

Command Web - Missouri shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. Command Web - Missouri shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment. [CP 012003-010, Special Condition 2]

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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

EU0080 – WEB PRESS #4 with Dryer Afterburner			
Emission Unit	Description	Manufacturer /Model #	2008 EIQ Reference #
EU0080	Web Press #4: one 4 -unit heatset web offset lithographic press with one web and one Ecocool/T130-1690 dryer afterburner; natural gas-fired (7.165 MMBtu/hr); MHDR 40,000 impressions/hr; 72.49 lb/hr; installed 2010	Goss Sunday 4000	Not installed

PERMIT CONDITION EU0080-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 082010-005, Issued August 6, 2010

Operation Limitation:

- 1) The Ecocool/T130-1680 dryer afterburner must be in use at all times when the Goss Web Press is in operation. [CP 082010-005, Special Condition 2.A]
- 2) The Ecocool/T130-1680 dryer afterburner shall be operated and maintained in accordance with the manufacturer's specifications. [CP 082010-005, Special Condition 2.B]
- 3) The operating temperature of the Ecocool/T130-1680 dryer afterburner shall be continuously monitored and recorded during operations. [CP 082010-005, Special Condition 2.C]
- 4) The temperature of the Ecocool/T130-1680 dryer afterburner must be maintained plus or minus 50 degrees of 1382 degrees Fahrenheit. [CP 082010-005, Special Condition 2.D]
- 5) Requirements for 100 percent capture efficiency.
 - a) The 100 percent capture was applied to EU-08 and the control device Ecocool/T130-1680 dryer afterburner. That portion of the printer that would allow emissions from the printer and the dryer afterburner shall be enclosed by ductwork. The ductwork shall allow for all of the emissions from the printer and the dryer to be drawn into the ductwork intake draft. The ductwork shall be maintained under negative pressure. It shall not be venting into the room, but exiting out the designated stack. [CP 082010-005, Special Condition 2.E.1]
 - b) The dryer afterburner shall demonstrate negative pressure by using visual indicators such as streamers, talc puff test, negative pressure gauges, flags, etc at openings that are not closed during normal operations. All openings must indicate the presence of negative pressure for compliance. [CP 082010-005, Special Condition 2.E.2]
 - c) The installation shall perform the visual indicator check for negative pressure at the Ecocool/T130-1680 dryer at least once every week or seven-day period while in operation. [CP 082010-005, Special Condition 2.E.3]

- 6) Command Web- Missouri shall maintain an operating and maintenance log for Ecocool/T130-1680 dryer afterburner which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of events, probable cause, and corrective actions taken. [CP 082010-005, Special Condition 2.F.1]
 - b) Maintenance activities, with inspection schedules, repair actions, and replacements. [CP 082010-005, Special Condition 2.F.2]
 - c) A record of regular inspection schedule, the date and results of all inspections, including any actions or maintenance activities that results from the inspections. Either paper copy or electronic formats are acceptable. [CP 082010-005, Special Condition 2.F.3]
- 7) Command Web-Missouri shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. Command Web-Missouri shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment. [CP 082010-005, Special Condition 3]

Monitoring/Recordkeeping:

Command Web-Missouri shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used. [CP 082010-005, Special Condition 4.A]

Reporting:

Command Web-Missouri shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit. [CP 082010-005, Special Condition 4.B]

EU0090 – SHEETFED PRESS #2			
Emission Unit	Description	Manufacturer /Model #	2008 EIQ Reference #
EU0090	Sheetfed Press #2: 6-unit sheetfed lithographic press with UV dryer and coating unit; MHDR 12,000 impressions per hour; 2.48 lb/hr; installed 2010	KBA 106	Not Installed

<p>PERMIT CONDITION EU0090-001 10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants</p>

Emission Limitation:

- 1) No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring:

- 1) The permittee shall conduct opacity readings on these emission units using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting,

observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.

- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) Note: Permit renewal or modification does not require the installation to revert to the weekly/bi-weekly opacity-monitoring schedule. If the permittee is currently performing semi-annual monitoring it may continue unless a violation is noted. The installation will only revert to weekly monitoring when a violation has been noted.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment D-1 or D-2), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment E)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment F)
- 4) Attachments D-1, D-2, E and F contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, must be used to certify compliance with this requirement.
- 5) All records shall be maintained for five (5) years. They shall be kept onsite for at least two (2) years. They may be kept in either hard-copy form or on computer media.
- 6) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

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), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

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(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(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, §(5)(C)(1) and §(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.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (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 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;

- iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and
 - iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
 - 4) Command Web - Missouri may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Command Web - Missouri fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
 - 5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
 - 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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.

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, §(5)(C)1 and §(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, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - 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's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than 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.
 - 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 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 annual 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 §(5)(C)1 and §(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(5)(C)1.A 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 under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) 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 Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances 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, §(5)(C)1 and §(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(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. 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; and
 - 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.

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

The application utilized in the preparation of this permit was signed by Chris A Huckleberry, 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri 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,
- 2) 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,
- 3) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the 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.

VI. Attachments

Attachments follow.

Attachment A
 Installation-Wide VOC Tracking Record
 Command Web Missouri
 Cole County, S19, T44N, R10W
 Installation ID Number: 051-0043
 Permit Number: OP2011-027

This sheet covers the period from _____ to _____.
 (month, year) (month, year)

Column 1	Column 2(a)	Column 3	Column 4	Column 5
Material Used (Name, type)	Amount of Material Used (include units)	Density (lb/gal)	VOC Content (Weight %)	VOC Emissions (tons)
(b) Total VOC emissions calculated for this month, in tons:				
(c) 12-month VOC emissions total from previous month's attachment A, in tons:				
(d) Monthly VOC emissions total (b) from previous year's attachment A, in tons				
(e) Current 12-month total of VOC emissions, in tons: [(b) + (c) - (d)]				

- Instructions: Choose appropriate VOC calculation method for units reported:
- (a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];
 - 2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
 - 3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].
 - (b) Summation of [Column 5], in tons;
 - (c) Record the previous 12-month VOC emissions total (e) from last month's attachment, in tons;
 - (d) Record the monthly VOC emissions total (b) from previous year's attachment, in tons;
 - (e) Calculate the new 12-month VOC emissions total.

A 12-month VOC emissions total of less than 100 tons indicates compliance.

Attachment B – Monthly Total HAPs Emissions Tracking Record

Command Web -Missouri
Cole County, S19, T44N, R10W
Project Number: 2008-03-080
Installation ID Number: 051-0043
Permit Number: OP2011-027

This sheet covers the month of _____
(month)

Column 1	Column 2 (a)	Column 3	Column 4	Column 5
Material Used (Name, Type)	Amount of Material Used (Include Units)	Density (lbs/gal)	HAP Content (Weight %)	HAP Emissions (Tons)
(b) Total HAP Emissions Calculated for this Month (tons):				
(c) 12-Month Total HAP Emissions total from Previous Month's Attachment B (tons):				
(d) Monthly Total HAP Emissions Total from previous year's Attachment B (tons):				
(e) Current 12-month Total of HAP Emissions (tons):				

Instructions: Choose appropriate VOC calculation method for units reported:

- (a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];
- 2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
- 3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].
- (b) Summation of [Column 5] in Tons;
- (c) 12-Month HAP emissions total (e) from last month's Worksheet A, in Tons;
- (d) Monthly HAP emissions total (b) from previous year's Worksheet A, in Tons;
- (e) Calculate the new 12-month HAP emissions total.

A 12-Month HAP emissions total (e) of less than 25.0 tons indicates compliance.

Attachment C– Monthly Individual HAPs Emissions Tracking Record

Command Web -Missouri
 Cole County, S19, T44N, R10W
 Project Number: 2008-03-080
 Installation ID Number: 051-0043
 Permit Number: OP2011-027

HAP Name: _____ CAS No.: _____

This sheet covers the month of _____ in the year _____.
 Copy this sheet as needed.

Column 1 (a)	Column 2 (b)	
List materials from Attachment B which emit this specific HAP (Name, Type)	HAP emissions from Attachment B [Column 5] (in Tons)	
(c) Total HAP Emissions Calculated for this Month, in Tons:		
(d) 12-Month HAP Emissions Total (f) from Previous Month's Attachment C, in Tons:		
(e) Monthly HAP Emissions Total (c) from Previous Year's Attachment C, in Tons:		
(f) Current 12-month Total of HAP Emissions in Tons: [(c) + (d) - (e)]:		

- Instructions: Choose appropriate HAP calculation method for units reported
- (a) Individually list each material which emits this specific HAP from this installation;
 - (b) Record the amount of HAP emissions already calculated for Attachment B in [Column 5] in Tons;
 - (c) Summation of [Column 2] in Tons;
 - (d) Record the previous 12-Month individual HAP emission total (f) from last month's Attachment C, in Tons;
 - (e) Record the monthly HAP emission total (c) from previous year's Attachment C, in Tons; and calculate the new 12-month individual HAP emissions total.
- A 12-Month individual HAP emissions total of less than ten (10.0) tons for the installation indicates compliance**

Attachment D-2
 Method 22 (Outdoor) Observation Log

This record keeping sheet or an equivalent form may be used for the recordkeeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

Method 22 (Outdoor) Observation Log		
Emission Unit		
Observer	Date	
Sky Conditions		
Precipitation		
Wind Direction	Wind Speed	
Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.		
Observation Clock Time	Observation Period Duration (minute: second)	Accumulative Emission Time (minute: second)
Begin Observation		
End Observation		

Attachment F
 Method 9 Opacity Emissions Observations

This recordkeeping sheet or an equivalent form may be used for the record keeping requirements of 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants.

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO _____
 Signature of Observer

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance; since it can take that long or longer to obtain a part 70 operating permit.

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) Intermediate Operating Permit Application, received March 20, 2008;
- 2) 2008 Emissions Inventory Questionnaire, received May 21, 2009; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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.

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

- 1) 10 CSR 10-6.100, *Alternate Emission Limits*
 - a) This rule is not applicable because the installation is in an ozone attainment area.
- 2) 10 CSR 10-6.400, *Restrictions of Emissions of Particulate Matter from Particulate Matter*
 - a) This rule was marked as applicable in the permit application; however, the rule is not applied in the operating permit because there are no emission sources that have the potential to emit particulate matter at a rate equal to or greater than 0.5 lb/hr.

Construction Permit Revisions

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

- 1) Missouri Department of Natural Resources Construction Permit 0194-007 authorized the installation of Web Press #1 (EU0010).

- a) Special Conditions 1, 5, and 6 of Construction Permit 0194-007 were superseded by Construction Permit 012003-010. Therefore, these conditions are not included in this operating permit.
 - b) Special Conditions 2, 3, and 4 are included in this operating permit.
- 2) Missouri Department of Natural Resources Construction Permit 1294-001 authorized the installation of Sheetfed Press #1 (EU0020) and UV Coater #1 (EU0030).
 - a) Special Conditions 1, 2 and 3 of Permit 1294-001 were superseded by Construction Permit 012003-010. Therefore, these conditions are not included in this operating permit.
 - 3) Missouri Department of Natural Resources Construction Permit 1096-017 authorized the installation of Web Press #2 (EU0040).
 - a) Special Conditions 1, 2, 3, and 4 of Permit 1096-017 were superseded by Construction Permit 012003-010. Therefore, these conditions were not included in this operating permit.
 - b) Special Condition 5 is included in this operating permit.
 - 4) Missouri Department of Natural Resources Construction Permit 012003-010 authorized the installation of Web Press #3 (EU0050).
 - a) Special Condition 1 states that this construction permit shall supersede Special Conditions 1, 5, and 6 of Construction Permit 0194-007, Special Conditions 1, 2 and 3 of Construction Permit 1294-001, and Special Conditions 1, 2, 3, and 4 of Construction Permit 1096-017.
 - b) Special Condition 2 is included in this operating permit.
 - 5) Missouri Department of Natural Resources Construction Permit 082010-005 authorized the installation of Web Press #4 (EU0080) and Sheetfed Press #2 with UV coating capability (EU0090).
 - a) Emission Limitation A states that the installation shall emit less than 250 tons of VOCs in any consecutive 12-month period from the entire installation. When Command Web-Missouri is in compliance with this permit's Plant Wide voluntary limit that less than 100 tons of VOCs shall be emitted in any consecutive 12-month period Emission Limitation A shall be complied with.

New Source Performance Standards (NSPS) Applicability

10 CSR 10-6.070 New Source Performance Regulations

- 1) 40 CFR Part 60, Subpart QQ, *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing*
 - a) This rule applies to publication rotogravure printing presses. This facility operates only lithographic printing presses. Therefore, this facility is not subject to this rule.

None of the other NSPS rules apply.

Maximum Achievable Control Technology (MACT) Applicability

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

- 1) 40 CFR Part 63, Subpart KK, *National Emission Standards for the Printing and Publishing Industry*
 - a) This rule applies to each facility that is a major source of hazardous air pollutants (HAP), at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated. This facility is not a major source of HAP and operates only lithographic printing presses. Therefore, this facility is not subject to this rule.

- 2) 40 CFR Part 63, Subpart JJJJ, *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating*
 - a) This rule applies to each facility that is a major source of hazardous air pollutants (HAP), at which paper and other web coating lines are operated. This facility is not a major source of HAP and operates only lithographic printing presses. Therefore, this facility is not subject to this rule.
- 3) 40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*
 - a) This rule applies to each facility that uses halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The facility's parts washer uses a nonhalogenated solvent. Therefore, this facility is not subject to this rule.

None of the other MACT rules apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to Air Pollution Control Program records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

None of the other NESHAP rules applies to the facility.

Other Regulatory Determinations

- 1) 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*
 - a) This rule is not applied in the operating permit because the facility does not use any combustion equipment for indirect heating. The dryers associated with Web Presses #1, #2 and #3 (EU0010, EU0040, and EU0050) and the regenerative thermal oxidizer are direct heating sources.
- 2) 10 CSR 10-6.260, *Restrictions of Emissions of Sulfur Compounds*
 - a) This rule is not applied to the dryers associated with Web Presses #1, #2 and #3 (EU0010, EU0040, and EU0050) and the regenerative thermal oxidizer because according to §(1)(A)2, combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 are exempt.

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.

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:

Tandi Edelman
Environmental Engineer

CERTIFIED MAIL: 70093410000190188889
RETURN RECEIPT REQUESTED

Mr. Chris Huckleberry
Command Web - Missouri
7100 One Color Way
Jefferson City, MO 65101

Re: Command Web - Missouri, 051-0043
Permit Number: **OP2011-027**

Dear Mr. Huckleberry:

Enclosed with this letter is your intermediate 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 (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Tandi Edelman at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/tek

Enclosures

c: Northeast Regional Office
PAMS File: 2008-03-080