



# 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 herein.

**Intermediate Operating Permit Number:** OP2016-042  
**Expiration Date:** FEB 17 2022  
**Installation ID:** 051-0043  
**Project Number:** 2015-11-002

**Installation Name and Address**

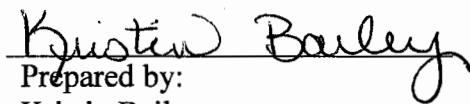
Command Web - Missouri  
7100 One Color Way  
Jefferson City, MO 65101  
Cole County

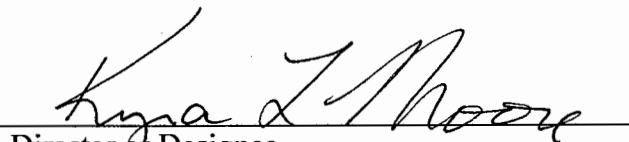
**Parent Company's Name and Address**

Command Web Offset Company, Inc.  
100 Castle Road  
Secaucus, NJ 07094

**Installation Description:**

Command Web – Missouri is a book manufacturing facility in Jefferson City specializing in soft cover books for children. 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. This installation is not on the list of named sources. Therefore fugitive emissions are not included in the Potential to Emit Calculations.

  
Prepared by:  
Kristin Bailey  
Operating Permit Unit

  
Director or Designee  
Department of Natural Resources

**FEB 17 2017**

Effective Date

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## I. Installation Equipment Listing

### 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>               |
|------------------------|---|
| EP-01                  | Web Press #1                                      |
| EP-04                  | Web Press #2                                      |
| EP-07                  | Web Press #3 with a Regenerative Thermal Oxidizer |
| EP-08                  | Web Press #4 with Dryer Afterburner               |
| EP-09                  | Sheetfed Printing Press                           |

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

| <u>Emission Unit #</u> | <u>Description of Emission Source</u> |
|------------------------|---------------------------------------|
| PARTS WASH             | Parts Washer                          |

## 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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations or Emission Units without Limitations.

### PERMIT CONDITION PW001

10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. 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:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/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.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

### 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.

**PERMIT CONDITION 001**  
 10 CSR 10-6.060 Construction Permits Required  
 Construction Permit 0194-007, Issued January 3, 1994

| Emission Unit | Description                  | Manufacturer/Model # |
|---------------|------------------------------|----------------------|
| EP-01         | 4-Unit Heat Set Web Press #1 | Heidelberg/M-1000BE  |

**Operational Limitation:**

- 1) The permittee shall cover the fountain solution mixing tanks for alcohol-based solutions at all times, except when production sampling, maintenance, or inspection procedures require operator access. [CP 0194-007, Special Condition 2]
- 2) The permittee shall keep the cleanup solvents in tightly covered tanks or containers during transport and storage. [CP 0194-007, Special Condition 3]
- 3) The permittee shall place the cleaning cloths used with the cleanup solvents 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 annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

**PERMIT CONDITION 002**  
 10 CSR 10-6.060 Construction Permits Required  
 Construction Permit 1096-017, Issued October 23, 1996

| Emission Unit | Description                 | Manufacturer/Model # |
|---------------|-----------------------------|----------------------|
| EP-04         | 2-Unit Heatset Web Press #2 | Heidelberg/M-1000A   |

**Operational Limitation:**

The permittee 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 annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

**PERMIT CONDITION 003**  
10 CSR 10-6.060 Construction Permits Required  
Construction Permit 012003-010, Issued January 13, 2003

| Emission Unit | Description   | Manufacturer/Model #        |
|---------------|---|-----------------------------|
| EP-07         | 4-Unit Heatset Web Press #3, with a Regenerative Thermal Oxidizer | Goss-Heidelberg/Sunday 2000 |

**Operational Limitation:**

The permittee 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 annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

**PERMIT CONDITION 004**  
10 CSR 10-6.060 Construction Permits Required  
Construction Permit 082010-005, Issued August 6, 2010

| Emission Unit | Description  | Manufacturer/Model # |
|---------------|--|----------------------|
| EP-08         | 4-Unit Heatset Web Press #4 with Dryer Afterburner | Goss Sunday 4000     |

**Operation Limitation:**

- 1) The permittee shall use the Ecocool/T130-1680 dryer afterburner at all times when the Goss Web Press is in operation. [CP 082010-005, Special Condition 2.A]
- 2) The permittee shall operate and maintain the Ecocool/T130-1680 dryer afterburner in accordance with the manufacturer’s specifications. [CP 082010-005, Special Condition 2.B]
- 3) The permittee shall continuously monitor and record the operating temperature of the Ecocool/T130-1680 dryer afterburner during operations. [CP 082010-005, Special Condition 2.C]
- 4) The permittee shall maintain the temperature of the Ecocool/T130-1680 dryer afterburner at plus or minus 50 degrees of 1382 degrees Fahrenheit. [CP 082010-005, Special Condition 2.D]
- 5) The permittee shall meet the following 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 permittee 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 on the dryer afterburner. All openings must indicate the presence of negative pressure for compliance. [CP 082010-005, Special Condition 2.E.2]
  - c) The permittee 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) The permittee shall maintain an operating and maintenance log for the 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) The permittee 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:**

- 1) 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. These records shall include Safety Data Sheets (SDS) for all materials used. [CP 082010-005, Special Condition 4.A]
- 2) The permittee shall use Attachment D or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program to demonstrate compliance with Operation Limitations.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/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]
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/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. The following are only excerpts from the regulation or code, and are provided for summary purposes only

### **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) 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.

### **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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
- 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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

#### **10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

#### **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 10-6.165 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.

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

#### **Emission Limitation:**

- 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 10-6.280 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 at an installation:
  - 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.

### **40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)**

- 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 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.

- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained 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.
  - 5) 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.*

## 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)(E)2 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, Compliance and 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. 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)**

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

**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, Compliance and 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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. 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)34 Responsible Official**

The application utilized in the preparation of this permit was signed by Mr. Chris 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 (MDNR) 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) MDNR 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

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_.

**Table 1**

| 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 %) | Uncontrolled VOC Emissions (tons) |
|  |   |                  |                        |                                   |
|  |   |                  |                        |                                   |
|  |   |                  |                        |                                   |
|  |   |                  |                        |                                   |
| (b) Total Uncontrolled VOC Emissions Calculated for this Month (tons): |   |                  |                        |                                   |

**Table 2 – EP-08 ONLY**

| 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 %) | Controlled VOC Emissions (tons) |
|  |   |                  |                        |                                 |
|  |   |                  |                        |                                 |
| (b) Total VOC Emissions before applying Control System Efficiency    |   |                  |                        |                                 |
| (c) Total Controlled VOC Emissions Calculated for this Month (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) To calculate the Controlled VOC Emissions, the Overall Control System Efficiency for EP-08 the Dryer Afterburner is 95%. Multiply the total VOC Emissions in Column 5 by 0.05 to calculate the total HAP Emissions.

**Table 3**

| Column 1  | Total VOC Emissions (TONS) |
|---|----------------------------|
| Total Uncontrolled VOC Emissions Calculated for this Month (tons) from Table 1:   |                            |
| Total Controlled VOC Emissions Calculated for this Month (tons) from Table 2:     |                            |
| (e) 12-Month Total VOC Emissions total from Previous Month's Attachment B (tons): |                            |
| (f) Monthly Total VOC Emissions Total from previous year's Attachment B (tons):   |                            |
| (g) Current 12-month Total of VOC Emissions (tons):                               |                            |

- (e) 12-Month VOC emissions total (e) from last month's Worksheet A, in Tons;
- (f) Monthly VOC emissions total (b) from previous year's Worksheet A, in Tons;
- (g) Calculate the new 12-month VOC emissions total.

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

Startup, Shutdown and malfunction emissions as reported to the Air Pollution Control Programs Compliance and Enforcement section during the most recent 12-month period must be included in the rolling total.

**ATTACHMENT B**

Monthly Total HAPs Emissions Tracking Record

This sheet covers the month of \_\_\_\_\_  
 (month)

**Table 1**

| 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 %) | Uncontrolled HAP Emissions (Tons) |
|  |   |                   |                        |                                   |
|  |   |                   |                        |                                   |
|  |   |                   |                        |                                   |
|  |   |                   |                        |                                   |
| (b) Total Uncontrolled HAP Emissions Calculated for this Month (tons): |   |                   |                        |                                   |

**Table 2 – EP-08 ONLY**

| 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 before applying Control System Efficiency    |   |                   |                        |                      |
| (c) Total Controlled HAP Emissions Calculated for this Month (tons): |   |                   |                        |                      |

**Instructions: Choose appropriate HAP 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) To calculate the Controlled HAP Emissions, the Overall Control System Efficiency for EP-08 the Dryer Afterburner is 90%. Multiply the total HAP Emissions in Column 5 by 0.10 to calculate the total HAP Emissions.

**Table 3**

| Column 1  | Total HAP Emissions (TONS) |
|---|----------------------------|
| Total Uncontrolled HAP Emissions Calculated for this Month (tons) from Table 1:   |                            |
| Total Controlled HAP Emissions Calculated for this Month (tons) from Table 2:     |                            |
| (e) 12-Month Total HAP Emissions total from Previous Month's Attachment B (tons): |                            |
| (f) Monthly Total HAP Emissions Total from previous year's Attachment B (tons):   |                            |
| (g) Current 12-month Total of HAP Emissions (tons):                               |                            |

- (e) 12-Month HAP emissions total (e) from last month's Worksheet B, in Tons;
- (f) Monthly HAP emissions total (b) from previous year's Worksheet B, in Tons;
- (g) Calculate the new 12-month HAP emissions total.

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

Startup, Shutdown and malfunction emissions as reported to the Air Pollution Control Programs Compliance and Enforcement section during the most recent 12-month period must be included in the rolling total.

**ATTACHMENT C**  
**Monthly Individual HAPs Emissions Tracking Record**

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) |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
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|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
| (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.**

Startup, Shutdown and malfunction emissions as reported to the Air Pollution Control Programs Compliance and Enforcement section during the most recent 12-month period must be included in the rolling total.

**ATTACHMENT D**

Operation/Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # or CVM # \_\_\_\_\_

| Date/Time | Inspection/<br>Maintenance<br>Activities | Operating<br>Temp | Malfunction Activities |        |          |       |        |          |
|-----------|--|-------------------|------------------------|--------|----------|-------|--------|----------|
|           |  |                   | Malfunction            | Impact | Duration | Cause | Action | Initials |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |
|           |  |                   |                        |        |          |       |        |          |

Startup, Shutdown and malfunction emissions as reported to the Air Pollution Control Programs Compliance and Enforcement section during the most recent 12-month period must be included in the rolling total.

# 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.

## INSTALLATION DESCRIPTION

Command Web – Missouri is a book manufacturing facility in Jefferson City specializing in soft cover books for children. The paper pages go through printing presses before being cut, bound and shipped. 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.

## Updated Potential to Emit for the Installation

| Pollutant         | Potential to Emit (tons/yr) <sup>1</sup> |
|-------------------|--|
| CO                | 6.62                                     |
| CO <sub>2</sub> e | 143.33                                   |
| HAP               | 10/25 <sup>2</sup>                       |
| NO <sub>x</sub>   | 7.884                                    |
| PM <sub>10</sub>  | 0.599                                    |
| PM <sub>2.5</sub> | 0.599                                    |
| SO <sub>x</sub>   | 0.0473                                   |
| VOC               | 100 <sup>2</sup>                         |

<sup>1</sup>Potential emissions are based upon 8,760 hours of controlled annual operation unless otherwise noted:

- ◆ Potential emissions of HAP are highly dependent upon the type of ink/solvent/cleaner/plate developer/etc. used. Potential emission calculations for EP-01, EP-04, EP-07, EP-08 and EP-09 were based upon a mass balance of the types of ink/solvent/cleaner/plate developer/etc. used at the installation from 2011 - 2015 as reported in the facility's annual EIQ. Any changes to the types of ink/solvent/cleaner/plate developer/etc. may result in changes to this potential to emit.

<sup>2</sup>The installation is limited by Permit Condition PW001 to:

- ◆ Less than 100 tons of VOCs from the entire installation during any consecutive 12 month period.
- ◆ Less than 10 tons of any individual HAPs from the entire installation during any consecutive 12 month period.
- ◆ Less than 25 tons of HAPs in aggregate from the entire installation during any consecutive 12 month period.

**Reported Air Pollutant Emissions, tons per year**

| <b>Pollutants</b>  | <b>2015</b> | <b>2014</b> | <b>2013</b> | <b>2012</b> | <b>2011</b> |
|--|-------------|-------------|-------------|-------------|-------------|
| Particulate Matter<br>≤ Ten Microns (PM <sub>10</sub> )  | 0.04        | 0.0330      | 0.0497      | 0.0497      | 0.0497      |
| Particulate Matter<br>≤ 2.5 Microns (PM <sub>2.5</sub> ) | 0.04        | 0.0330      | 0.0497      | 0.0497      | 0.0497      |
| Sulfur Oxides<br>(SO <sub>x</sub> )                      | 0           | 0.0026      | 0.0039      | 0.0039      | 0.0039      |
| Nitrogen Oxides<br>(NO <sub>x</sub> )                    | 0.43        | 0.4341      | 0.6525      | 0.6525      | 0.6525      |
| Volatile Organic Compounds(VOC) <sup>1</sup>             | 19.84       | 19.8483     | 21.5776     | 21.5776     | 21.5776     |
| Carbon Monoxide<br>(CO)                                  | 0.36        | 0.3646      | 0.5481      | 0.5481      | 0.5481      |
| Hazardous Air Pollutants<br>(HAPs)                       | 0.2585      | 0.2585      | 0.25850     | 0.2585      | 0.2585      |

<sup>1</sup>The installation does emit HAPS; however, the installation reports their HAP emissions as VOCs as explained in 10 CSR 10-6.110 - *Reporting Emission Data, Emission Fees, and Process Information.*

**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) 2015 Emissions Inventory Questionnaire, received February 16, 2016;
- 2) 2014, 2013, 2012 and 2011 Emissions Inventory Questionnaires
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) U.S. EPA’s Factor Information Retrieval (FIRE) Data System, 6.25
- 5) Construction Permit 0194-007, Issued January 12, 1994
- 6) Construction Permit 1294-001, Issued December 2, 1994
- 7) Construction Permit 1096-017, Issued October 23, 1996
- 8) Construction Permit 012003-010, Issued January 23, 2003
- 9) No Construction Permit Required Determination, Issued February 8, 2007
- 10) Construction Permit 082010-005, Issued August 6, 2010
- 11) Intermediate Operating Permit, Issued June 3, 2011
- 12) Intermediate Operating Permit Application, received October 30, 2015;

**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.

10 CSR 10-6.100 *Alternate Emission Limits* is not applicable to the installation and has not been applied within this permit. This rule applies to installations that emit VOC in ozone nonattainment areas. [10 CSR 10-6.100(1)(A)] The installation is in an ozone attainment area.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*

This rule is not applicable and has not been applied within this permit. The facility is exclusively fueled by natural gas, which is exempt under 10 CSR 6.220 (K).

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* was rescinded on November 30, 2015 and replaced by 10 CSR 6.261 *Control of Sulfur Dioxide Emissions*. This rule is not applicable to the installation and has not been applied within this permit as 10 CSR 10-6.260 exempts installations that are fueled exclusively by natural gas.

10 CSR 10-6.400, *Restrictions of Emissions of Particulate Matter from Particulate Matter* 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 Permits**

Construction Permit 0194-007, Issued January 12, 1994

- ◆ This construction permit authorized the installation of Web Press #1
- ◆ 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.
- ◆ Special Conditions 2, 3, and 4 are included in this operating permit.

Construction Permit 1294-001, Issued December 2, 1994

- ◆ This construction permit authorized the installation of Sheetfed Press #1 and a UV Coater #1.
- ◆ This equipment is no longer installed at this facility; therefore, the special conditions of this construction permit have not been included within this permit

Construction Permit 1096-017, Issued October 23, 1997

- ◆ This construction permit authorized the installation of Web Press #2.
- ◆ 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.
- ◆ Special Condition 5 is included in this operating permit.

Construction Permit 012003-010, Issued January 27, 2003

- ◆ This construction permit authorized the installation of Web Press #3.
- ◆ 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.



- ◆ Special Condition 2 is included in this operating permit.

No Construction Permit Required Determination, Issued February 8, 2007:

- ◆ This no construction permit required determination is for the installation of a Thermal Oxidizer.

Construction Permit 082010-005, Issued August 6, 2010

- ◆ This construction permit authorized the installation of Web Press #4 and Sheetfed Press #2 with UV coating capability.
- ◆ 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**

40 CFR Part 60, Subpart QQ – *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing* is not applicable to the installation and has not been applied within this permit. The provisions of this subpart apply to each publication rotogravure printing press. [§60.430(a)] None of the printing presses at the installation are rotogravure.

#### **Maximum Achievable Control Technology (MACT) Applicability**

40 CFR Part 63, Subpart KK – *National Emission Standard for the Printing and Publishing Industry* is not applicable to the installation and has not been applied within this permit. The provisions of this subpart apply to publication rotogravure, product and packaging rotogravure, and wide-web flexographic printing presses located at major sources of HAPs. [§63.820(a)(1)] The installation is a minor source of HAPs.

40 CFR Part 63, Subpart JJJJ – *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating* is not applicable to the installation and has not been applied within this permit. The provisions of this subpart apply to facilities with web coating lines that are major sources of HAPs. [§63.3280] The installation is a minor source of HAPs.

40 CFR Part 63, Subpart OOOO - *National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles* is not applicable to the installation and has not been applied within this permit. The provisions of this subpart apply to facilities with web coating lines that are a major source of HAPs. [§63.4281(b)] The installation is a minor source of HAPs.

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*: 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. [§63.460(c)] The facility's parts washer uses a non-halogenated solvent. Therefore, this facility is not subject to this rule.

#### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

In the permit application and according to APCP 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.

### **Greenhouse Gas Emissions**

Potential emissions of greenhouse gases (CO<sub>2</sub>e) for this installation are calculated to be 143.33 tons, classifying the installation as a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO<sub>2</sub>e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub>e emissions were not included within this permit.

### **Other Regulatory Determinations**

10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin* is applicable to the installation, has been applied within this permit. See section *IV. Core Permit Requirements*. Since the facility only utilizes natural gas in the presses they are not expected to have visible emissions, therefore no monitoring, recordkeeping or reporting requirements are required.

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

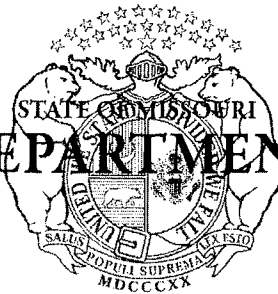
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 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 APCP a schedule for achieving compliance for that regulation(s).

### **Public Notice**

The operating permit was placed on Public Notice on September 30, 2016 through October 31, 2016. There were no comments received during this period.



Eric R. Greitens, Governor • Todd Sampsell, Acting Director

# DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

FEB 17 2017

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

Re: Command Web - Missouri, 051-0043  
Permit Number: OP2016-042

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.

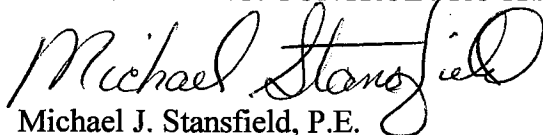
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

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 contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS/kbj

Enclosures

c: PAMS File: 2015-11-002



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