



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

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JAN 11 2016

Mr. Jeffery Cain  
ITW Labels  
#1 Missouri Research Park Drive  
St. Charles, MO 63304

Re: ITW Labels, 183-0206  
Permit Number: OP2015-044

Dear Mr. Cain:

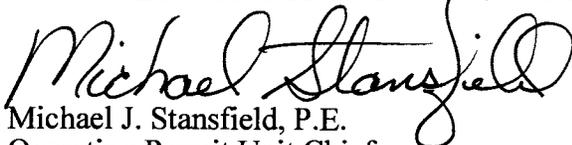
Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements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

Enclosures

c: PAMS File: 2014-07-022



# 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:** OP2015-044  
**Expiration Date:** JAN 1 1 2021  
**Installation ID:** 183-0206  
**Project Number:** 2014-07-022

**Installation Name and Address**

ITW Labels  
#1 Missouri Research Park Drive  
St. Charles, MO 63304  
St. Charles County

**Parent Company's Name and Address**

ITW  
3600 West Lake Ave  
Glenview, IL 60025

**Installation Description:**

ITW Labels is a manufacturing facility located in St. Charles, MO. The facility uses nine flexographic printing presses for the production of custom and stock labels for industrial and retail markets.

The installation has taken voluntary limits for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) to become an area source for permitting purposes.



Prepared by:  
Jacob Robinett  
Operating Permit Unit



Director or Designee  
Department of Natural Resources

JAN 1 1 2016

Effective Date

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# I. Installation Description and Equipment Listing

## INSTALLATION DESCRIPTION

ITW Labels runs its converting operation in a 93,000 square foot facility located in St. Charles, MO. In May of 2001 ITW (Illinois Tool Works) acquired Diagraph. The facility is also used by Diagraph’s Design and Development Center, Life-and-Reliability Laboratory, System Integration Department and a complete Assembly and Testing Center for automated product identification products. Even though the ITW owns those businesses, they have different management and reporting structures as well as different Standard Industrial Classification (SIC) codes. ITW Labels is independent of the other businesses located at the facility. The installation is not a named source.

ITW Labels produces custom and stock labels for industrial and retail markets. The facility uses nine (9) flexographic printing presses. The facility has taken an Emission Limitation of less than 100 tons per year for VOCs and a limit of less than 10 tons individual HAP and less than 25 tons of all HAPs combined. As part of Construction Permit 112012-008, ITW Labels was required to apply for an Intermediate Operating Permit. On May 30, 2014, a Letter of Warning was sent to ITW Labels since the installation had not obtained an Intermediate Operating Permit as required by Construction Permit 112012-008.

<b>Reported Air Pollutant Emissions, tons per year</b>					
Pollutants	2013	2012	2011	2010	2009
Volatile Organic Compounds(VOC)	3.84	3.84	7.71	7.71	7.71
Hazardous Air Pollutants (HAPs)	0.05	0.05	0.17	0.17	0.17

## 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.

None.

## 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

EP-1	Press 1, Mark Andy/AETEK UV 16”, constructed 2002
EP-2	Press 2, Mark Andy 16”, constructed 2002
EP-3	Press 2, Mark Andy 16”, constructed 2002
EP-4	Press 3, Mark Andy 20”, constructed 2002
EP-5	Press 4, Mark Andy 16”, constructed 2002
EP-6	Press 4 UV Dryer, AETEK UV, constructed 2002
EP-7	Press 5, Mark Andy, constructed 2005

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Description of Emission Source

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EP-8	Press 5 UV Dryer, UV Technology, constructed 2005
EP-11	Press 6, Mark Andy 16", constructed 2002
EP-12	Press 6, Mark Andy 16", constructed 2002
EP-13	Press 6 UV Dryer, IST America, constructed 2002
EP-14	Cyrel Fast Thermal Developer, Dupont 1000TD/TD1170169, constructed 2007
EP-15	Press 7, Mark Andy 7", constructed 2009
EP-16	Press 7 UV Dryer, Online Energy, constructed 2009
EP-17	Press 8, Mark Andy 10" 8-color press, constructed 2012
EP-18	Press 9, Mark Andy 7" 6-color press, constructed 2012
EP-19	Two UV dryers, Light Touch, constructed 2012

## 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 and Emission Units without Limitations.

### **PERMIT CONDITION PW001**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit #112012-008A, Issued December 3, 2012  
Construction Permit #112012-008B, Issued September 23, 2014

#### **Emission Limitation:**

ITW Labels shall emit less than 547.5 pounds of VOCs per day from the entire installation. [Special Condition 2.A.]

#### **Operational Limitation:**

- 1) ITW Labels shall keep all inks, solvents, thinners, varnishes, adhesives and overcoats in sealed containers whenever the materials are not in use. ITW Labels shall provide and maintain suitable, easily read, permanent markings on all ink, solvent, thinner, varnish, adhesive and overcoat containers used with this equipment. [Special Condition 3.]
- 2) When considering using an alternative coating material for the installation that is different than the materials listed on the MSDS sheets for ACTEGA WIT, Inc's Flexographic Printing ink, Water Ink Technologies Inc's Versifilm Plus Transparent White ink, Sun Chemical Corporation UV Gloss Varnish, Enviro-Kleen Industrial degreaser/cleaner shall calculate the potential emissions of all HAPs in the alternative material with Attachment C. [Special Condition 4.A.]
- 3) ITW Labels shall seek approval from the Air Pollution Control Program before use of the alternative coating material if the potential individual HAP emissions for the alternative material are equal to or greater than the screening model action level (SMAL) or if the potential total HAPs emissions is greater than 25.0 tons from the entire installation. [Special Condition 4.B.]

#### **Monitoring/Recordkeeping:**

- 1) Daily recordkeeping is required to demonstrate compliance with emission limitation using Attachment B or equivalent forms such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance. [Special Condition 2.B.]
- 2) ITW Labels shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 3.A.]

#### **Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during Attachment B, if Special Condition #2.B. indicates that the source exceeds the emission limitation of Special Condition #2.A.

- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.

**PERMIT CONDITION PW002**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit #112012-008B, Issued September 23, 2014  
10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

**Emission Limitation:**

- 1) ITW Labels shall emit less than ten tons of Ethylene Glycol Ethers in any consecutive 12-month period from the entire installation. [Special Condition 1.A.]
- 2) ITW Labels shall emit less than ten tons individually and twenty-five tons combined of Hazardous Air Pollutants (HAPs) from the entire installation in any consecutive 12-month period.

**Operational Limitation:**

- 1) When considering using an alternative coating material for the installation that is different than the materials listed in the Application for Authority to Construct, ITW Labels shall calculate the potential emissions of all HAPs in the alternative material with Attachment C. [Special Condition 2.A.]
- 2) ITW Labels shall seek approval from the Air Pollution Control Program before use of the alternative coating material if the potential individual HAP emissions for the alternative material are equal to or greater than the screening model action level (SMAL) or if the potential total HAPs emissions is greater than 25.0 tons from the entire installation. [Special Condition 2.B.]

**Monitoring/Recordkeeping**

- 1) Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with the Ethylene glycol Ethers limitation. [Special Condition 1.B.]
- 2) Attachment D or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with the total HAP emissions limitation from the entire installation.
- 3) Attachment E or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with the individual HAP emission limitation.
- 4) ITW Labels shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 3.A.]

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during Attachment A, if Special Condition #1.B. indicates that the source exceeds the emission limitation of Special Condition #1.A. [Special Condition #3.B.]
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.

**PERMIT CONDITION PW003**

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

**Emission Limitation:**

The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of twenty percent (20%).

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are 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 permittee must maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
- 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:**

The permittee shall maintain records of all observation results using Attachment F (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

### **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.

None.

## 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 is only an excerpt from the regulation or code, and is 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) 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 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos**

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

#### **10 CSR 10-6.100 Alternate Emission Limits**

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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

- 1) The permittee shall submit 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) The permittee may be required by the director to file additional reports.

- 3) 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.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 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.
- 5) 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.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

#### **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.

**Monitoring:**

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
  - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
  - b) If a violation is noted, monitoring reverts to weekly.
  - c) Should no violation of this regulation be observed during this period then-
    - i) The permittee may observe once per month.
    - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

**Recordkeeping:**

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

<b>10 CSR 10-6.180 Measurement of Emissions of Air Contaminants</b>
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- 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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**

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

#### **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”;
  - 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.

**10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited**

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)**

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

**10 CSR 10-5.130 Certain Coals to be Washed**

The permittee shall not import, sell, offer for sale, expose for sale, exchange, deliver or transport for use and consumption in the St. Louis metropolitan area or use or consume in the said area any coal which as mined containing in excess of 2.0% sulfur or 12.0% ash calculated as described in 10 CSR 10-5.110, unless it has been cleaned by a process known as "washing" so that it shall contain no more than 12.0% ash on a dry basis. The term "washing" is meant to include purifying, cleaning, or removing impurities from coal by mechanical process, regardless of cleaning medium used.

**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.
- 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, 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)**

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, 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, 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 Jeffery Cain, Business Unit 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 B**  
 Daily VOC Compliance Worksheet

This sheet covers \_\_\_\_\_ (copy as needed)  
 (dd/mm/yyyy)

(a)	(b)	(c)
Printing Press #	Emission Point	Hours of Operation
Press #1	EP-1	
Press #2	EP-2,EP-3	
Press #3	EP-4	
Press #4	EP-5,EP-6	
Press #5	EP-7,EP-8	
Press #6	EP-11,EP-12,EP-13	
Press #7	EP-15,EP-16	
Press #8	EP-17	
Press #9	EP-18,EP-19	
Total Hours of Operation		
Average Hours of Operation		

- 1) Record the date
- 2) Record the hours of operation for each printing press including startup and shutdown time.
- 3) Sum the hours of operation from all presses
- 4) Divide the Total Hours of Operation by 9.0

**Average Hours of Operation less than or equal to 16 hours implies compliance.** In the event of a malfunction, the permittee shall demonstrate that they have not exceeded the daily limit of VOC emissions.

$$26.87 \frac{\text{lbs of VOC}}{\text{hr}} * 16 \frac{\text{hr}}{\text{day}} = 429.92 \frac{\text{lbs of VOC}}{\text{day}}$$

**Attachment C**  
 Alternate Material Compliance Worksheet

(a)	(b)	(c)	(d)	(e)	(f)	(g)
Coating Material	HAP	MHDR (gal/hour)	Density (lbs/gallon)	HAP Content (weight %)	PTE (lb/hr)	PTE (tpy)
<i>Ex: VersiFilm Plus</i>	ethylene glycol ether	100.0	9.0	1.0%	9.0	39.42
<b>(h) Total HAP Potential to Emit (tons per year)</b>						

- a) Record the proposed new coating material
- b) Record each HAP contained in the new coating material
- c) Record the Maximum Hourly Design Rate
- d) Record the density of the new coating from the MSDS
- e) Record the HAP weight % of the new coating from the MSDS
- f) Calculate using the following equation:  $(f) = (c) * (d) * (e)$
- g) Calculate using the following equation:  $(g) = (f) * 8760 / 2000$
- h) Sum all annual HAP PTE (g) for the coating.

**Compare the PTE of each HAP to the respective SMAL values that can be found at the following website: <http://www.dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf>**







# 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 July 8, 2014;
- 2) 2013 Emissions Inventory Questionnaire, received March 21, 2014;
- 3) Construction Permit No. 112002-002;
- 4) Construction Permit No. 032003-024;
- 5) Construction Permit No. 042005-011;
- 6) Construction Permit No. 112012-008;
- 7) Construction Permit No. 112012-008A;
- 8) Construction Permit No. 112012-008B; and
- 9) 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.

None.

### Construction Permit History

The following is a brief history of construction permits issued for this installation:

#### *Construction Permit No. 112002-002*

Issued August 20, 2002, this permit allowed Diagraph Labeling to construct 5 flexographic presses for printing labels at the installation. This permit established a 10.0 ton limit of Ethylene Glycol Monopropyl Ether in any consecutive 12-month period.

#### *Construction Permit No. 032003-024*

Issued March 19, 2003, this permit allowed for the installation of Kelleigh Model 310 Rotary Flexographic Platemaker.

#### *Construction Permit No. 042005-011*

Issued April 12, 2005, this permit allowed for the installation of a Mark Andy LP3000 flexographic press. The conditions of this permit supersede all special conditions from previously issued construction permits (Permit No. 112002-002 and 032003-024). This permit established a 10.0 ton limit of Ethylene Glycol Monopropyl Ether in any consecutive 12-month period.

#### *Construction Permit No. 112012-008*

Issued November 19, 2012, this permit allows for the installation of a Mark Andy 2200-10" 8-color flexographic printing press, a Mark Andy 2200-7" 6-color flexographic printing press, and the associated dryers. The conditions of the permit supersede all special conditions found in previous issued construction permits. The permit establishes a VOC limit of less than 547.5 lbs per day from the entire installation. The facility is capable of emitting up to 26.87 lbs of VOC per hour. If the facility operates at full capacity less than 20.39 hours per day, then the facility will remain an area source for VOCs. If the facility remains an area source of VOCs, then 10 CSR 10-5.340 is not applicable to the facility.

$$26.87 \frac{\text{lbs of VOC}}{\text{hr}} * 16 \frac{\text{hr}}{\text{day}} = 429.92 \frac{\text{lbs of VOC}}{\text{day}}$$

The value of 26.87 lbs of VOC/hr was taken from the combined PTE in pounds per hour of all sources of VOC running their maximum hourly design rate. The permit requires the facility to track the number of hours of operation for each press. To make sure that the facility remains an area source, the average hours of operation for all nine presses is shall be less than or equal to 16 hours per day to guarantee installation potential to emit of VOC's will be less than 100 tons per year and 547.5 pounds per day. If the average is greater than 16 hours for a day, the facility can demonstrate it emitted less than 547.5 pounds for that day to remain in compliance.

$$429.92 \frac{\text{lbs of VOC}}{\text{day}} * 365 \frac{\text{day}}{1 \text{ year}} * \frac{1 \text{ ton of VOC}}{2000 \text{ lbs of VOC}} = 78.46 \frac{\text{ton of VOC}}{\text{year}}$$

The permit requires the permittee to seek approval from the Air Pollution Control Program before use of alternative coating material if the potential individual HAP emissions for the alternative material are equal to or greater than the screening model action level (SMAL) or if the potential total HAPs emissions is greater than 25.0 tons from the entire installation. Each HAP has a SMAL value. This special condition creates a limit for individual HAPs to emit less than their SMAL

value, and a limit of 25.0 tons for the entire installation. SMAL values that can be found at the following website: <http://www.dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf>

*Construction Permit No. 112012-008A*

Issued June 7, 2013, this permit was to correct an error that was made in the previous permit. The attachments and special conditions of this permit supersede all special conditions found in the previously issued permits.

*Construction Permit No. 112012-008B*

Issued September 23, 2014, this permit was to correct an error that was made to the previous permit. A special condition to limit the amount of Ethylene Glycol Ethers emissions had been erroneously omitted from the final permit. The facility had been tracking the amount and the permit was amended to include the limit of amount of Ethylene glycol Ethers the facility can emit.

**New Source Performance Standards (NSPS) Applicability**

None.

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

40 CFR Part 63 Subpart KK, *National Emission Standards for the Printing and Publishing Industry*

This regulation applies to facilities that operate flexographic printing presses and are major sources for hazardous air pollutants (HAPs). Permit Condition PW002 in this permit requires the permittee to seek approval from the Air Pollution Control Program before the use of an alternative coating material if the potential individual HAP emissions from the alternative material are equal to or greater than the screen model action level (SMAL) or if the potential total HAP emissions is greater than 25.0 tons from the entire installation.

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

None.

**Updated Potential to Emit for the Installation**

Pollutant	Potential to Emit (tons/yr) <sup>1</sup>
CO	
CO <sub>2</sub> e	
HAP	<10.0/25.0
NO <sub>x</sub>	
PM <sub>10</sub>	
PM <sub>2.5</sub>	
SO <sub>x</sub>	
VOC	<100.0

<sup>1</sup>Potential to emit values were taken from Table 4 in Construction Permit No. 112012-008.

All dryers and Cyrel Fast Thermal Developer, EP-14, at the facility are power electrically and emissions were not included in calculation above.

**Other Regulatory Determinations**

10 CSR 10-5.340, *Control of Emissions From Rotogravure and Flexographic Printing Operations*

This regulation applies to installations with the potential to emit at least 250 kilograms (550 lb) per day or 100 ton 12-month rolling total of uncontrolled VOC emissions

In order to remain below both levels, Permit Condition PW001 incorporated the VOC emission limit of 547.5 lbs per day from CP112012-008A. This guarantees compliance with both daily and yearly VOC limits associated with this regulation. ITW Labels is capable of emitting up to 26.87 lbs of VOC/hr. If the facility operates at full capacity less than 20 hours per day, then the facility will not be subject to this regulation. Therefore, the facility can demonstrate that it is not subject to this regulation by tracking the hours of operation for each press using Attachment B.

10 CSR 10-5.455, *Control of Emissions from Industrial Solvent Cleaning Operations*

This rule applies to facilities that use organic solvents in industrial cleaning operations. According to 5.455(1)(C)6, a facility with solvent cleaning operations including the “cleaning operation in printing pre-press or graphic arts pre-press area, including the cleaning of film processors, color scanners, plate processors, film cleaning, and plate cleaning” are not subject to the provisions of the rule. Therefore, this regulation has not been included in the permit.

10 CSR 10-5.500, *Control of Emissions from Volatile Organic Liquid Storage*

This rule applies to facilities that have storage containers that store volatile organic liquid. This rule does not apply because the facility does not have any storage containers with a capacity of 40,000 gallons or larger, and all the containers has a maximum true vapor pressure less than 0.5 psia. However, the facility shall maintain readily accessible records of the dimensions of the storage container and an analysis of the capacity of the storage container. Each storage container with a design capacity less than forty thousand (40,000) gallons is subject to no provision of this rule other than those required by maintaining readily accessible records of the dimensions of the storage container and analysis of the capacity of the storage container per 10 CSR 10-5.500(4)(F).

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

This rule applies to all sources of particulate matter emissions throughout the State of Missouri. All of the equipment at the installation is printing presses, the pollutant of concern from these units is VOC's and HAPs, therefore, no monitoring and record keeping requirements were included in this permit.

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

This rule applies to all sources of visible air contaminants emissions throughout the State of Missouri. Although the majority of the sources at the facility are printing presses, there can still be particulate emissions from the presses.

**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).

## Response to Public Comments

During the public comment period, comments were received from Mark A. Smith, Chief of Air Permitting and Compliance Branch at EPA Region 7 on July 14, 2015. The comments are addressed in the order in which they appear within the letter(s).

**Comment 1:** The **Installation Description** on the draft operating permit cover sheet says that ITW Labels in St. Charles is an area source for volatile organic compounds (VOC) and hazardous air pollutants (HAPs). However, it appears that the facility, in fact, has the potential-to-emit (PTE) greater than major source thresholds levels and ITW labels appears to have taken voluntary permit limits to meet area source levels. Therefore, EPA recommends MDNR-APCP amend the Installation Description on the operating permit cover sheet to reflect ITW's voluntary emission limitations.

**Response to Comment:** Installation Description has been modified to reflect that the installation took voluntary limits to become an area source for permitting purposes.

**Comment 2:** The **Installation Description and Equipment Listing** in **Section I** of the operating permit includes two (2) sub-sections: **Emission Units With Limitations** (i.e. unit-specific limitations), and **Emission Units Without Limitations** (i.e. do not have specific unit limitations). The emission units with specific limitations list includes: Emission Units EP-1 through EP-8; EP-11 through EP-13; and EP-15 through EP-19. However, **Section III, Emission Units Specific Emission Limitations**, of the draft operating permit, says there are none that apply. This appears to be an unusual situation where MDNR-APCP has listed sixteen (16) emission units with unit specific emission limits, yet, includes no emission unit specific emission limitation permit conditions. EPA recommends MDNR-APCP provide an explanation to answer this anomaly.

**Response to Comment:** The sections have been amended to reflect the permit conditions listed in the operating permit.

**Comment 3:** **Permit condition PW001** appears to establish a voluntary limitation on the emissions of volatile organic compounds (VOC) from the entire installation. The "installation," as defined in 10 CSR 10-6.020, includes "all source operations including activities that result in fugitive emissions." Permit Condition PW001 also appear to require the permittee to use Attachment B, or equivalent, to demonstrate compliance. However, a review of Attachment B shows that ITW Labels does not include emission points EP-9, EP-10 and EP-14 in their compliance determination. To effectively limit ITW Labels VOC emissions, the VOC emission limit must apply at all times to all emission points. Additionally, the draft operating permit is unclear whether or not all actual VOC emissions are being considered in determination of compliance with the 547.5 pound per day limit.

In its response to a petition filed against the Hu Honua Bioenergy Facility, the Environmental Protection Agency reiterates that, for purposes of determining the potential-to-emit (PTE) of a stationary source, the PTE shall encompass the maximum capacity of a stationary source to emit a pollutant under its physical and operational

design. Thus emissions from all units that are part of the entire installation must be included in calculating PTE for purpose of compliance determination. Similarly, EPA has previously explained that when a source accepts a source wide limit for a pollutant, all actual emissions of that pollutant, including start up, shut down and malfunction must be considered in compliance determination with the emission limit. Therefore, EPA recommends MDNR-APCP revise Attachment B to include all emission units and clarify in the operating permit that limit applies at all times.

**Response to Comment:** Additional wording has been added at the beginning on Section II. Plant Wide Emission Limitations to state that all emission units listed in Section I under Emission Units with Limitations or Emission Units without Limitations are included under Plant Wide Emission Limitations.

There is no EP-9 and EP-10 located at the facility, and EP-14 is not a source of VOC is why they are not listed on Attachment B.

In regards to the startup, shutdown and malfunction emissions the attachment has been modified to indicate that startup and shutdown time is to be included in the hours of operation. Emissions from malfunctions and upsets are required to be reported to the Air Pollution Control Program's Enforcement Section per 10 CSR 10-6.050.

**Comment 4: Permit condition PW001** includes an operation limitation that requires ITW Labels to calculate potential emission of all hazardous air pollutants (HAPs) in alternative coating materials for the installation that are different than the materials listed in the *Application for Authority to Construct*. This permit condition is too vague to be enforceable from a practical matter. Permit conditions must contain sufficient detail to ensure that the facility and public clearly understand the obligations in the permit and how compliance is evaluated. The presence of vague permit language makes a permit condition virtually unenforceable. The public does not have ready access to the *Application for Authority to Construct* and therefore has no method of verifying the permittee is in compliance. Therefore, EPA recommends MDNR-APCP list the approved coating materials associated with ITW Labels *Application for Authority to Construct*.

Additionally, Permit Condition PW001 requires ITW Labels to use Attachment C to calculate the potential emission of all HAPs in alternative materials. However, Permit Condition PW001 contains no record keeping / reporting requirements associated with these HAP calculations. EPA recommends MDNR-APCP include specific reporting / record keeping requirements for Attachment C.

**Response to Comment:** A list of all of the products that were submitted along with the *Application for Authority to Construct* have been included in the permit condition so that if the permittee would need to submit the document if planning to use an alternative material other than listed.

Additional recordkeeping and reporting requirements has been added to PW001 to clarify what the permittee is required to do.

**Comment 5: Permit Condition PW002** imposes a voluntary 10 tons per consecutive 12-month period of ethylene glycol ether and 25 tons per consecutive 12-month period of all HAPs combined from the entire installation. Permit Condition PW002 also requires ITW labels to use Attachment A, or equivalent, to demonstrate compliance. However, Attachment A provides a record for tracking only annual ethylene glycol ether usage. Permit Condition PW002 does not address any monitoring/record keeping required to verify compliance with the HAP limitation. The draft operating permit does include Attachment D and Attachment E, which appear to be for HAP tracking. Therefore, EPA recommends MDNR-APCP specify the monitoring/record keeping requirements for HAP emissions limitations compliance demonstration in Permit Condition PW002.

Additionally, Permit Condition PW002 requires ITW Labels to use Attachment C to calculate the potential emission from all HAPs in alternative materials. However, Permit Condition PW002 contains no record keeping / reporting requirements associated with these HAP calculations. EPA recommends MDNR-APCP include specific reporting / record keeping requirements for Attachment C.

**Response to Comment:** Permit conditions have been added to specify the monitoring/record keeping requirements for HAP emissions.

**Comment 6:** Emission Limitation in **Permit Condition PW003** identifies “owner or other person” as the individual responsible for the control of opacity to not exceed 20%. MDNR-APCP customary practice is to specify the “permittee” as the compliance individual. Therefore, EPA recommends MDNR-APCP replace “owner or other person” with “permittee.”

**Response to Comment:** Correction to the wording has been made.