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: OP2017-022
Expiration Date: MAR 22 2022
Installation ID: 047-0122
Project Number: 2013-03-011

Installation Name and Address
LSC Communications, Inc-Liberty
3401 Heartland Drive
Liberty, MO 64058
Clay County

Parent Company’s Name and Address
LSC Communications US, LLC
35 W Wacker Drive
Chicago, IL 60601

Installation Description:
The installation operates lithographic and inkjet printing presses to print magazines and direct mail pieces. The installation has accepted limits on volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) to obtain this Intermediate Operating Permit. The installation consists of six heat set lithographic presses, each press is equipped with a dryer and 14 inkjet printers. All presses are controlled by one regenerative thermal oxidizer. The installation is not a named source, therefore fugitive emissions are not included in determining operating permit applicability.

Prepared by:
Nicole Weidenbenner, PE
Operating Permit Unit

Director or Designee
Department of Natural Resources
MAR 22 2017
Effective Date
Table of Contents

I. INSTALLATION EQUIPMENT LISTING ............................................................................................................................ 4
   EMISSION UNITS WITH LIMITATIONS ............................................................................................................................ 4
   EMISSION UNITS WITHOUT LIMITATIONS ....................................................................................................................... 4
   INSTALLATION EQUIPMENT LISTING ............................................................................................................................ 4

II. PLANT WIDE EMISSION LIMITATIONS ........................................................................................................................ 5
    PERMIT CONDITION PW1 .................................................................................................................................................. 5
    10 CSR 10-6.060 Construction Permits Required .......................................................................................................... 5
    Construction Permit # 012007-013, Issued January 22, 2007 ......................................................................................... 5
    PERMIT CONDITION PW2 .................................................................................................................................................. 6
    10 CSR 10-6.020(2)(123), and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s) ................................................................. 6

III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS ...................................................................................................... 7
    PRINTING PRESSES ........................................................................................................................................................ 7
    PERMIT CONDITION 1 ....................................................................................................................................................... 7
    10 CSR 10-6.060 Construction Permits Required .......................................................................................................... 7
    Construction Permit # 012007-013, Issued January 22, 2007 ......................................................................................... 7
    PRINTING PRESSES ........................................................................................................................................................ 8
    PERMIT CONDITION 2 ....................................................................................................................................................... 8
    10 CSR 10-2.340 Control of Emissions From Lithographic Printing Installations ................................................................. 8
    PNEUMATIC TRANSFER SYSTEM ................................................................................................................................... 10
    PERMIT CONDITION 3 ....................................................................................................................................................... 10
    10 CSR 10-6.060 Construction Permits Required .......................................................................................................... 10
    PNEUMATIC TRANSFER SYSTEM ................................................................................................................................... 10
    PERMIT CONDITION 4 ....................................................................................................................................................... 11
    10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants ............................................................................... 11
    EMERGENCY BACKUP GENERATOR .............................................................................................................................. 11
    PERMIT CONDITION 5 ....................................................................................................................................................... 11
    40 CFR 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal
    Combustion Engines ........................................................................................................................................................... 11

IV. CORE PERMIT REQUIREMENTS ........................................................................................................................................ 13

V. GENERAL PERMIT REQUIREMENTS .................................................................................................................................. 19

VI. ATTACHMENTS ............................................................................................................................................................. 23
    ATTACHMENT A ............................................................................................................................................................ 24
    Visible Emission Observations ........................................................................................................................................... 24
    ATTACHMENT B ............................................................................................................................................................ 25
    Inspection/Maintenance/Repair/Malfunction Log ............................................................................................................... 25
    ATTACHMENT C ............................................................................................................................................................ 26
    Monthly Combined HAPs Tracking Record .................................................................................................................. 26
    ATTACHMENT D ............................................................................................................................................................ 27
    Monthly Individual HAPs Tracking Record .................................................................................................................. 27
    ATTACHMENT E1 .......................................................................................................................................................... 28
    VOC Limitations Emissions from Presses, Dryer and RTO ............................................................................................... 28
    ATTACHMENT E2 .......................................................................................................................................................... 29
    VOC Limitation-emissions from all other sources ........................................................................................................ 29
    ATTACHMENT E3 .......................................................................................................................................................... 30
    VOC Limitation-Calculation of 12 month rolling totals .................................................................................................. 30
    ATTACHMENT F .......................................................................................................................................................... 31
    10 CSR 10-2.340 Compliance-Alcohol .......................................................................................................................... 31
    ATTACHMENT G .......................................................................................................................................................... 32
    10 CSR 10-2.340 Compliance-VOC .......................................................................................................................... 32
ATTACHMENT H .......................................................................................................................................... 33
Pressure Drop Log for Dust Collectors........................................................................................................ 33
I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS
The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations. Emissions from these units are included in any plant wide limitations established in this permit.

<table>
<thead>
<tr>
<th>EP#</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01</td>
<td>Press #23 and dryer</td>
</tr>
<tr>
<td>EP02</td>
<td>Press #24 and dryer</td>
</tr>
<tr>
<td>EP03</td>
<td>Press #82 and dryer</td>
</tr>
<tr>
<td>EP04</td>
<td>Pneumatic Transfer System</td>
</tr>
<tr>
<td>EP05</td>
<td>Press #92 and dryer</td>
</tr>
<tr>
<td>EP07</td>
<td>Press #98 and dryer</td>
</tr>
<tr>
<td>EP08</td>
<td>Press #20 and dryer</td>
</tr>
<tr>
<td>EP09</td>
<td>Regenerative Thermal Oxidizer</td>
</tr>
<tr>
<td>EP15</td>
<td>Emergency Backup Generator</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITHOUT LIMITATIONS
The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance. Emissions from these units are included in any plant wide limitations established in this permit.

<table>
<thead>
<tr>
<th>EP#</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP06</td>
<td>Fugitive Emissions</td>
</tr>
<tr>
<td>EP10</td>
<td>Inkjet Printers (14 total)</td>
</tr>
<tr>
<td>EP11</td>
<td>Paper Hogger</td>
</tr>
<tr>
<td>EP12</td>
<td>Gluing Operations</td>
</tr>
<tr>
<td>EP13</td>
<td>Space Heaters (total 11.29 MMBtu/hr)</td>
</tr>
<tr>
<td>EP14</td>
<td>Paper Baler</td>
</tr>
<tr>
<td>EP16</td>
<td>Binding</td>
</tr>
</tbody>
</table>
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. The following requirements apply to all conditions in this permit, unless otherwise noted.

**Monitoring:**
The permittee shall calibrate, maintain and operate all pollution control devices and pollution monitoring related instruments according to the manufacturer’s recommendations or according to good engineering practices. Where emission factors are used, the permittee shall cite the source of the emission factor.

**Recordkeeping:**
The permittee shall record all required record keeping (i.e. inspections and corrective actions) in an appropriate format. The permittee shall keep a copy of this Operating Permit and review on site as well as copies of all issued Construction Permit and reviews on site. The permittee shall maintain all Safety Data Sheets (SDS) for all materials. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations. The permittee’s written inspection procedures shall be made available to department personnel upon request. All records must be kept for a minimum of 5 years.

**Reporting:**
1. The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
2. The permittee shall submit an annual compliance certification. All deviations must be included in the compliance certifications.
3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
2. Cleaning cloths used with the cleanup solvents must be placed in tightly closed containers when not in use and while awaiting off-site transportation. [Special Condition #6B]

**Monitoring:**
1. The permittee shall monitor the emissions of HAPs.
2. The permittee shall monitor all ink, solvent, and cleaning solution containers to ensure permanent markings are suitable.

**Recordkeeping:**
1. The permittee shall calculate and record the installation-wide emissions of individual and combined HAPs on a monthly and consecutive 12-month rolling basis.
2. Attachments C and D contain logs including these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement. [Special Condition #2B]

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### PERMIT CONDITION PW2

10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

**Emission Limitation:**
The permittee shall emit less than 100 tons of VOC in any consecutive 12-month period from the entire installation.

**Monitoring:**
The permittee shall monitor the emissions of VOC.

**Recordkeeping:**
1. The permittee shall calculate and record the installation-wide emissions of VOC on a monthly and consecutive 12-month rolling basis.
2. Attachments E1, E2, and E3 contain logs including these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
### 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.

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
<th>Manufacturer/ Model #</th>
<th>Control Device</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01</td>
<td>Press #23: 5 unit heatset web offset lithographic printing press with 4.08 MMBtu/hr natural gas fired dryer, 132 lbs ink/hr, Constructed 2003</td>
<td>Heidelberg-Harris/ M-1000B</td>
<td></td>
</tr>
<tr>
<td>EP02</td>
<td>Press #24: 8 unit heatset web offset lithographic press with 7 MMBtu/hr natural gas fired dryer, 190 lbs ink/hr, Constructed 2004</td>
<td>Heidelberg-Harris/M-1000</td>
<td></td>
</tr>
<tr>
<td>EP03</td>
<td>Press #82: 8 unit heatset web offset lithographic printing press with 8.88 MMBtu/hr natural gas fired dryer, 85 lbs ink/hr, Constructed 1991</td>
<td>Heidelberg-Harris/ M-300</td>
<td>Regenerative Thermal Oxidizer, Mfr: L &amp; E America, Model # TR-4093C, 5.61 MMBtu/hr natural gas fired, Constructed 2004 (EP9)</td>
</tr>
<tr>
<td>EP05</td>
<td>Press #92: 8 unit heatset web offset lithographic printing press with 9.75 MMBtu/hr natural gas fired dryer, 102 lb ink/hr, Constructed 1995</td>
<td>Heidelberg-Harris/ M-600</td>
<td></td>
</tr>
<tr>
<td>EP07</td>
<td>Press #98: 8 unit heatset web offset lithographic printing press with 9.75 MMBtu/hr natural gas fired dryer, 102 lbs ink/hr, Constructed 1998</td>
<td>Heidelberg-Harris/ M-600</td>
<td></td>
</tr>
<tr>
<td>EP08</td>
<td>Press #20: 5 unit heatset web offset lithographic printing press with 4.44 MMBtu/hr natural gas fired dryer, 130 lbs ink/hr, Constructed 2000</td>
<td>Heidelberg-Harris/ M-1000BE</td>
<td></td>
</tr>
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</table>

**PERMIT CONDITION 1**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit # 012007-013, Issued January 22, 2007

**Operational Limitation:**

1. The natural gas fired regenerative thermal oxidizer (EP9) at the installation must be in use at all times when the associated equipment, Press #23, Press #24, Press #82, Press #92, Press #98 (originally known as Press #93), and Press #20 (originally known as Press #99), are in operation. The RTO shall be operated and maintained in accordance with the manufacturer’s specifications. The RTO shall achieve a destruction/removal efficiency of volatile organic compounds (VOCs) of at least ninety percent (90%). [Special Condition #3A]

**Monitoring:**

The operating temperature of the RTO shall be continuously monitored and recorded. The operating temperature of the RTO shall equal or exceed 1362°F. [Special Condition #3B and Stack Test]
**Recordkeeping:**

1. The permittee shall maintain an operating, maintenance and inspection log for the regenerative thermal oxidizer which shall include the following: [Special Condition #3C]
   a) Incidents of malfunction(s) including the date(s) and duration of the event, the probable cause, any corrective actions taken and the impact on emissions due to the malfunction;
   b) Any maintenance activities conducted on the unit, such as replacement of equipment, etc.; and
   c) A written record of regular inspection schedule, the date and results of all inspections including any actions or maintenance activities that result from that inspection
2. Attachment B contains a log including these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

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<td>Heidelberg-Harris/ M-1000B</td>
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</table>

**PERMIT CONDITION 2**

10 CSR 10-2.340 Control of Emissions From Lithographic Printing Installations

*Alternative Operating Scenario:*

Normally, the installation does not use alcohol based inks. However, the installation requested the flexibility to do so if needed. Prior to bringing alcohol based inks on site, the installation must evaluate the applicability of 10 CSR 10-6.060, Construction Permits Required and 10 CSR 10-6.061 Construction Permit Exemptions. If the requirement to obtain a construction permit is met, then the permittee must obtain a construction permit prior to bringing alcohol based inks on site.
If the alternative scenario does not require a construction permit, then:

1) The permittee may operate under the requirements of 10 CSR 10-2.340 that pertain to alcohol based inks that are included in this permit condition. Any emissions resulting from this alternate operating scenario must be included when calculating compliance with the plant-wide limitations in this operating permit.

2) According to 10 CSR 10-6.065(5)(C)1.C., the permittee may make changes among alternate operating scenarios authorized in this operating permit without notice. The permittee is required to maintain a contemporaneous log on site documenting the change from one scenario to another.

**Emission Limitation:**

1. The permittee shall not use or permit the use of any offset lithographic printing press unless—
   a) The fountain solution contains 10.0% or less by weight of alcohol; or
   b) The fountain solution is refrigerated to a temperature of 55 degrees Fahrenheit (°F), or less for alcohol-based solutions;
   c) The fountain solution temperature at the mixing tank for alcohol-based solutions is monitored during each shift; and
   d) The fountain solution mixing tanks are covered for alcohol-based based solutions.

2. The permittee shall not use or permit the use of any offset lithographic printing press that uses cleanup solutions containing VOCs unless—
   a) The cleanup solutions are kept in tightly covered tanks or containers during transport and storage;
   b) The cleaning cloths used with the cleanup solutions are placed in tightly closed containers when not in use and while awaiting off-site transportation. The cleaning cloths should be properly cleaned and disposed. The cloths, when properly cleaned or disposed, shall be processed in such a way that as much of the solvent, as practicable, is recovered for further use or is destroyed. Cleaning and disposal methods shall be approved by the director; and
   c) The permittee may use an alternate method for reducing cleanup solvent VOC emissions, including the use of low VOC cleanup solvents, if the permittee shows the emission reduction is equal to or greater than those in 10 CSR 10-2.340(3)(B)1. and 2. This alternate method must be approved by the director.

**Monitoring:**

1. Percent of the alcohol content of alcohol-based fountain solution by weight shall be monitored on a once per day basis. Direct measurement of the alcohol content of the fountain solution sample(s) shall be performed with a modification of the EPA Method 415.1. Alternately, a sample of the fountain solution may be taken from the fountain tray or reservoir of fountain solution during use and measured with a hydrometer or refractometer. The unit shall be considered in compliance if the refractometer or hydrometer measurement is less than or equal to the measurement obtained with a modification of EPA Method 415.1, plus 10%;

2. Determination of fountain solution temperature for refrigerated alcohol-based fountain solutions shall be monitored on a once per shift basis by a thermometer or other temperature detection device capable of reading to 0.5 degree Fahrenheit (°F);

3. The permittee shall monitor the throughputs of alcohol, inks, clean-up solvents and VOC-containing coatings and shall maintain all safety data sheets.

4. Testing and compliance demonstrations for 10 CSR 10-2.340(3)(C) shall follow the procedures contained in Environmental Protection Agency Reference Methods 25 or 25A found in 40 CFR Part 60, Appendix A
5. Testing and compliance demonstrations for 10 CSR 10-2.340(3)(A)1. shall be based on the results from a calibrated hydrometer or refractometer.

**Recordkeeping:**
1. The permittee shall maintain records as required by 10 CSR 10-2.340(4) sufficient to determine continuous compliance.
2. The permittee shall maintain records for each control device sufficient to demonstrate that the control efficiency is being maintained.
3. For each regulated printing press, records shall be maintained to show:
   a) Quantity of alcohol added to alcohol-based fountain solutions of each regulated press in pounds each month;
   b) Percent of alcohol in alcohol-based fountain solution by weight as monitored on a once per shift basis;
   c) Results of any testing conducted on an emission unit;
   d) The temperature of alcohol-based fountain solution as recorded on a once-per shift basis.
4. For each lithographic installation, records shall be maintained to show:
   a) Properties of heatset inks as applied (determined by the manufacturer’s formulation data), density of inks in pound per gallon and total VOC content in weight percent;
   b) Quantity of heatset inks as applied to substrate in pounds on a monthly basis;
   c) Quantity of clean-up solvents used on a monthly basis; and
   d) Quantity of VOC-containing coatings used on a monthly basis and percent VOC in coating by weight on a formulation basis.
5. Attachments F and G contain logs including these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with these requirements.

<table>
<thead>
<tr>
<th>Pneumatic Transfer System</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Point</td>
</tr>
<tr>
<td>EP04</td>
</tr>
</tbody>
</table>

**PERMIT CONDITION 3**
10 CSR 10-6.060 Construction Permits Required
Construction Permit # 012007-013, Issued January 22, 2007

**Operational Limitation:**
The permittee shall control emissions from the pneumatic transfer system using a baghouse as specified in the construction permit application. The baghouse shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the DNR employees may easily observe them. Replacement filters for the baghouse shall be kept on hand at all times (for replacement of torn or broken filter). The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition #5A]

**Monitoring:**
The permittee shall monitor the operating pressure drop across the baghouse at least daily during operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition #5B]
**Recordkeeping:**

1. The permittee shall maintain an operating and maintenance log for the baghouse which shall include the following: [Special Condition #5C] 
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and 
   b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
2. The permittee shall record the operating pressure drop across the baghouse at least daily during operation.
3. Attachments B and H contain logs including these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with these requirements

<table>
<thead>
<tr>
<th>Pneumatic Transfer System</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Point</td>
</tr>
<tr>
<td>EP04</td>
</tr>
</tbody>
</table>

**PERMIT CONDITION 4**

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

**Emission Limitation:**

1. The permittee shall not cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring/Recordkeeping/Reporting:**
None—see Statement of Basis.

<table>
<thead>
<tr>
<th>Emergency Backup Generator</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Point</td>
</tr>
</tbody>
</table>

**PERMIT CONDITION 5**

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

**Operational Requirements:**

1. The permittee must be in compliance with the applicable requirements of MACT ZZZZ at all times. [§63.6605(a)]
2. At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. [§63.6605(b)]
3. The permittee shall operate and maintain the engine according to the manufacturer’s emission-related written instructions or develop a site specific plan as specified in §63.6625(e) and Table 6 of MACT ZZZZ.

4. The permittee shall install a non-resettable hour meter as specified in §63.6625(f).

5. The permittee shall minimize the engine’s time spent at idle and the start up time as specified in §63.6625(h).

6. For each RICE, the permittee must meet the following requirements: [Table 2d, item #5]
   a) Change oil and filter every 500 hours of operation or annually, whichever comes first; (The permittee has the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement.)
   b) Inspect spark plugs every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and
   c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

**Operational Limitations:**

1. The permittee shall operate the emergency stationary RICE according to the requirements in paragraphs §63.6640(f)(1), (2) and (4). In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs §63.6640(f)(1), (2) and (4), is prohibited. If the permittee does not operate the engine according to the requirements in paragraphs §63.6640(f)(1), (2), and (4), the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must meet all requirements for non-emergency engines. [§63.6640(f)]

**Recordkeeping Requirements:**

1. The permittee shall keep records as required in §63.6655.

**Reporting:**

1. The permittee shall submit notifications as required in §63.6645
2. The permittee must submit reports as required in §63.6640(b) and §63.6650.
3. The permittee shall submit reports to the Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. Copies of these reports shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102
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.


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.

**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 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 is a State Only permit requirement.
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. Issuance of this permit does not restart the 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 equipment malfunctions contributed to an exceedance.
3) Any violations and any corrective actions undertaken to correct the violation.

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 10-6.250 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.

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.

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**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

See Permit Condition 2.

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 Richard E. Johnson, Vice President of Manufacturing. 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.


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.
## Visible Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Emission Source</th>
<th>Visible Emissions</th>
<th>Excess Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>No</td>
<td>Yes (^1)</td>
</tr>
</tbody>
</table>

\(^1\)If there are visible emissions, the permittee shall complete the excess emissions columns.
### Attachment B
Inspection/Maintenance/Repair/Malfunction Log

Emission Point # ________________________________

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/ Maintenance Activities</th>
<th>Malfunction Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Malfunction</td>
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</tbody>
</table>
### Attachment C
Monthly Combined HAPs Tracking Record

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

Table 1: Mass balance HAP emissions from presses, inkjet printers, and gluing operations

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2 (a)</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 4b</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used, (Name, HAP CAS #)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (lbs/gal)</td>
<td>HAP Content (Weight %)</td>
<td>HAP control system efficiency</td>
<td>HAP Emissions (Tons)</td>
</tr>
</tbody>
</table>

(b) Total HAP Emissions Calculated for this Month in Tons:

**INSTRUCTIONS:** Choose appropriate HAP calculation method for units reported. When using SDS values, the highest value must be used. Column 4b is used only for materials that pass through the RTO system

(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;

Table 2: HAP emissions from combustion from Emergency generator, Space Heating, Dryers, and RTO

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4 (c)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit #</td>
<td>Throughput (MMCF)</td>
<td>HAP Emission Factors (lb/MMCF)</td>
<td>HAP emissions (tons)</td>
</tr>
</tbody>
</table>

(c) Total HAP Emissions Calculated for this Month in Tons:

(c) HAP emissions are calculated by the following equation: [Column 2] x [Column 3] x [0.0005] = [Column 4]

1) HAP emission factors shall be sourced from approved performance testing. If testing has not been performed and approved, then EPA emission factors contained in AP42 or webFIRE may be used. Emission factors must include all HAPs.

(d) Summation of [Column 4] in tons;

Table 3: Calculation of plant wide emissions

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4 (e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Summation of totals from Tables 1 and 2 (tons)</td>
<td>12-Month HAP Emissions Total from Previous Month’s Attachment in Tons:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(f) Monthly HAP Emissions Total (b) from Previous Year’s Attachment in Tons:</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>(h) Current 12-month Total of HAP Emissions in Tons: [(e) + (f) - (g)]</td>
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<td></td>
</tr>
</tbody>
</table>

(e) Summation of Table 1 and 2: (b) + (d)
(f) 12-Month HAP emissions (e) from last month's Attachment C in Tons;
(g) Monthly HAP emissions total (e) from the previous year's Attachment C in Tons;

**Calculate the new 12-month combined HAPs emissions total.** A 12-Month HAP emissions total (h) of less than 25 tons indicates compliance. Startup, shutdown and malfunction emissions must be included.
**Attachment D**

Monthly Individual HAPs Tracking Record

HAP Name: ________________________ CAS No.: ________________________

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

Copy this sheet as needed

<table>
<thead>
<tr>
<th>Column 1 (a)</th>
<th>Column 2 (b)</th>
</tr>
</thead>
<tbody>
<tr>
<td>List from Attachment C which emit this specific HAP (Name, Type)</td>
<td>Emissions from Attachment C (in Tons) for this specific HAP</td>
</tr>
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</tbody>
</table>

(c) Total HAP Emissions Calculated for this Month, in Tons: ________________________

(d) 12-Month HAP Emissions Total (f) from Previous Month's Attachment D, in Tons: ________________________

(e) Monthly HAP Emissions Total (c) from Previous Year's Attachment D, in Tons: ________________________

(f) Current 12-month Total of HAP Emissions in Tons: [(c) + (d) - (e)]: ________________________

**INSTRUCTIONS:**

(a) Individually list each material which emits this specific HAP;
(b) Record the amount of HAP emissions already calculated for Attachment C 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 D, in Tons;
(e) Record the monthly HAP emission total (c) from previous year's Attachment D, in Tons:
(f) **Calculate the new 12-month individual HAP emissions total.** A 12-Month individual HAP emissions total of less than ten (10.0) tons indicates compliance. Startup, shutdown and malfunction emissions must be included.
**Attachment E1**

**VOC Limitations Emissions from Presses, Dryer and RTO**

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

### Table 1: VOC Mass balance for presses

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2 (a)</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 4b</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used (Name, Type)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (Pounds per Gallon)</td>
<td>VOC Content (Weight %)</td>
<td>VOC system control efficiency</td>
<td>VOC Emissions (Tons)</td>
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</tbody>
</table>

(b) Total uncontrolled VOC emissions calculated for this month (tons):

Instructions: Choose appropriate VOC calculation method for units reported. When a range of values is provided on an SDS, use the highest value. VOC system control efficiency established during testing.

(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 (tons);

### Table 2: VOC emissions from combustion of dryers and RTO:

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3(c)</th>
<th>Column 4 (d)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit #</td>
<td>Monthly throughput (MMCF)</td>
<td>Emission factor (lb VOC/MMSCF)</td>
<td>VOC Emissions (tons)</td>
</tr>
<tr>
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</tbody>
</table>

(e) Total uncontrolled VOC emissions calculated for this month (tons):

(c) Multiply monthly throughput by 5.5 lb VOC/MMSCF, from AP42, Table 1.4-2, or other appropriate factor from AP42.

(d) Convert emissions to tons: (d) = 0.0005*(c)

(e) Summation of column 4 (tons)

### Table 3: Combined emissions from Attachment E1, Tables 1 and 2:

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3(c)</th>
<th>Column 4 (d)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(f) Total uncontrolled VOC emissions calculated for this month (tons):</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(g) Total controlled VOC emissions calculated for this month (tons):</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(f) Total uncontrolled VOC emissions from all presses, dryers, and the RTO. (f) = (b)+(e)

(g) Multiply (f) by (1-(capture efficiency) *(control efficiency)). The most recent performance test indicates 98.2% control. Based on those values, the equation simplifies to: [(f)*(1-.982)]
### Attachment E2

**VOC Limitation—emissions from all other sources**

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

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2 (a)</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used (Name, Type)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (Pounds per Gallon)</td>
<td>VOC Content (Weight %)</td>
<td>VOC Emissions (Tons)</td>
</tr>
</tbody>
</table>

(b) Total uncontrolled VOC emissions calculated for this month (tons):

Instructions: Choose appropriate VOC calculation method for units reported. When a range of values is provided on an MSDS, use the highest value.

(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 (tons);

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3(c)</th>
<th>Column 4 (d)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit #</td>
<td>Monthly throughput (MMCF)</td>
<td>Emission factor (lb VOC/MMCF)</td>
<td>VOC Emissions (tons)</td>
</tr>
</tbody>
</table>

(e) Total uncontrolled VOC emissions calculated for this month (tons):

(c) Multiply monthly throughput by 5.5 lb VOC/MMSCF, from AP42, Table 1.4-2.
(d) Convert emissions to tons: (d) = 0.0005*(c)
(e) Summation of column 4 (tons)

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3(f)</th>
<th>Column 4 (g)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit #</td>
<td>Monthly throughput (MMCF)</td>
<td>Emission factor (lb VOC/MMCF)</td>
<td>VOC Emissions (tons)</td>
</tr>
</tbody>
</table>

(h) Total uncontrolled VOC emissions calculated for this month (tons):

(f) Multiply monthly throughput by the emission factor from AP42, Table 3.2-1, which provides an emission factor of 0.12 lb/MBtu. Multiplying by 1020 MMBtu/MMCF yields an emission factor of 122.4 lb VOC/MMCF.

(g) Convert emissions to tons: (d) = 0.0005*(c)
(h) Summation of column 4 (tons)

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit #</td>
<td>Monthly throughput (MMCF)</td>
<td>Emission factor (lb VOC/MMCF)</td>
<td>VOC Emissions (tons)</td>
</tr>
</tbody>
</table>

(i) Total uncontrolled VOC emissions calculated for this month (tons):

(i) Summation of uncontrolled VOC emissions from Attachment E2. (i) = (b) + (e) + (h)
**Attachment E3**  
VOC Limitation-Calculation of 12 month rolling totals

Table 1: Calculation of the 12 month rolling total:

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td>(a)</td>
<td>Total controlled VOC emissions from Attachment E1 calculated for this month (tons):</td>
</tr>
<tr>
<td>(b)</td>
<td>Total uncontrolled VOC emissions from Attachment E2 calculated for this month (tons):</td>
</tr>
<tr>
<td>(c)</td>
<td>Total VOC emissions for this month (tons):</td>
</tr>
<tr>
<td>(d)</td>
<td>12-month VOC emissions total (c) from previous month's Attachment E3 (tons):</td>
</tr>
<tr>
<td>(e)</td>
<td>Monthly VOC emissions total (c) from previous year's Attachment E3 (tons):</td>
</tr>
<tr>
<td>(f)</td>
<td>Current 12-month Total of controlled VOC emissions (tons):</td>
</tr>
</tbody>
</table>

(a) Value from Attachment E1 (g)  
(b) Value from Attachment E2 (i)  
(c) Summation of (a) and (b)  
(d) 12 month VOC emissions total (c) from last month’s Attachment E3 (tons)  
(e) Monthly VOC emissions total (c) from previous year’s Attachment E3 (tons)  
(f) 12 month rolling sum of VOC emissions (tons): (f) = (c) + (d) – (e).

A 12 month rolling sum (f) of less than 100 tons is required for compliance. Startup, shutdown and malfunction emissions must be included.
**Attachment F**

10 CSR 10-2.340 Compliance-Alcohol

Temperature should never exceed 55°F
Percent by volume of alcohol should never exceed 10%.
Press #:____________________

<table>
<thead>
<tr>
<th>Date</th>
<th>Shift</th>
<th>Quantity alcohol added to fountain solution (lbs/month)</th>
<th>Alcohol in fountain solution (% by weight) (once per shift)</th>
<th>Temperature of alcohol based fountain solution (ºF) (once per shift)</th>
</tr>
</thead>
<tbody>
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</table>
### Attachment G
10 CSR 10-2.340 Compliance-VOC

For the month of __________ in the year __________

<table>
<thead>
<tr>
<th>Properties of Heatset inks as applied</th>
<th>Density of inks (lbs/gallon)</th>
<th>Total VOC content (% by weight)</th>
<th>Quantity heatset inks as applied to substrate (lbs/month)</th>
<th>Quantity clean up solvents used (monthly)</th>
<th>Quantity coatings used (monthly)</th>
<th>% VOC in coating by weight (formulation basis)</th>
</tr>
</thead>
</table>
Attachment H
Pressure Drop Log for Dust Collectors

<table>
<thead>
<tr>
<th>Control Device ID</th>
<th>Date/Time</th>
<th>Pressure Drop (inches water)</th>
<th>Within specifications? (Yes/No)</th>
</tr>
</thead>
<tbody>
<tr>
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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
The installation operates lithographic and inkjet printing presses to print magazines and direct mail pieces. The installation has accepted limits on volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) to obtain this Intermediate Operating Permit. The installation consists of six heat set lithographic presses, each press is equipped with a dryer and 14 inkjet printers, as well as paper handling and binding sources. All presses are controlled by one regenerative thermal oxidizer. The installation is not a named source, therefore fugitive emissions are not included in determining operating permit applicability.

The installation started as Clark Printing. In 1996, the name changed to Banta Publications-Kansas City. In October 2006, the name changed to RR Donnelley, with the most recent name change in October 2016 to LSC Communications.

The emissions profile of the installation is presented in the table below. Construction Permit 012007-013 provides an in-depth review of the potential emissions of the installation. The installation has a less than 10/25 tpy HAP limitation established by Construction Permit 012007-013, and a less than 100 tpy VOC limitation established by this (and previous) Operating Permit.

### Emissions Profile

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>Reported Emissions (tons/yr)</th>
<th>Conditioned Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2011</td>
<td>2012</td>
</tr>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM10)</td>
<td>0.1849</td>
<td>0.1849</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM2.5)</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Sulfur Oxides (SO2)</td>
<td>0.0092</td>
<td>0.0092</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOx)</td>
<td>1.541</td>
<td>1.541</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>23.3309</td>
<td>28.2601</td>
</tr>
</tbody>
</table>
Pollutants | Reported Emissions (tons/yr) | Conditioned Potential Emissions (tons/yr)
--- | --- | ---
Carbon Monoxide (CO) | 1.2944 | 1.2944 | 1.29 | 1.63 | 1.64 | 22.82
Hazardous Air Pollutants (HAPs) | <10/25

**Greenhouse Gas Emissions**
There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO$_2$e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO$_2$e emissions were not included within this permit.

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

1) Intermediate Operating Permit Application, received March 4, 2013;
2) 2015 Emissions Inventory Questionnaire, received January 26, 2016;
4) Intermediate Operating Permit, OP2008-041;
5) Construction Permit #0691-004;
6) Construction Permit #0295-004;
7) Construction Permit #0398-004;
8) Construction Permit #072000-001;
9) Construction Permit #012001-003;
10) Construction Permit #062003-014;
11) Construction Permit #042004-006;
12) Construction Permit #042004-006A;
13) No Permit Required Determination, PAMS #2004-07-075; and

**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 the following requirements to not be applicable to this installation at this time for the reasons stated.
10 CSR 10-2.040, Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating
This regulation was rescinded October 30, 2011 and replaced with 10 CSR 10-6.405-Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating.

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds
10 CSR 10-6.261, Control of Sulfur Dioxide Emissions
These regulations exempt units that burn exclusively pipeline grade natural gas. All of the combustion units at this installation meet this exemption.

10 CSR 10-6.405-Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating
This regulation does not apply to the printing press dryers and the regenerative thermal oxidizer because they are direct heating units, the products of combustion contact process materials.

**Construction Permit History**
1. Construction Permit 0784-003A
   This permit authorized installation of a four color Solna C-96 printing press. This permit was superseded by Construction Permit #012007-013.
2. Construction Permit 0691-004
   This permit authorized the installation to move from Pleasant Valley, MO to Liberty, MO. This move required relocation of Presses #41, 51, 61, and 82, along with all control devices and other production equipment. This permit was superseded by Construction Permit #012007-013.
3. Construction Permit 0295-004
   This permit authorized installation of an eight unit web offset printing press (#820). This permit was superseded by Construction Permit #012007-013.
4. Construction Permit 0398-004
   This permit authorized installation of an eight unit web offset printing press (#93). This permit was superseded by Construction Permit #012007-013.
5. Construction Permit 072000-001
   This permit authorized installation of a web offset printing press (#99). This permit was superseded by Construction Permit #012007-013.
6. Construction Permit 012001-003
   This permit authorized installation of a web offset printing press (#21), to replace press #62. This permit was superseded by Construction Permit #012007-013.
7. Construction Permit 062003-014
   This permit authorized installation of a web offset printing press (#23), to replace press #41. This permit was superseded by Construction Permit #012007-013.
8. Construction Permit 042004-006
   This permit authorized installation of a web offset printing press (#24), to replace press #21. This permit was superseded by Construction Permit #012007-013.
9. No Permit Required Letter, PAMS 2004-07-075
   This letter authorizes the reconfiguration of exhaust from the seven web offset lithographic printing presses. At the time of the application, each press is controlled by individual catalytic oxidizers. The reconfiguration will directly connect all presses to the existing regenerative thermal oxidizer. The existing catalytic oxidizers will be retained as backup units in case of RTO failure.
10. Construction Permit 042004-006A
This amends Construction Permit 042004-006 to allow the installation the flexibility of operating the backup emission control unit for press #24. This permit/amendment was superseded by Construction Permit #012007-013.

11. Construction Permit 012007-013
This permit supersedes all previously issued construction permits for this installation. This permit establishes a 10/25 tons per year limit on HAP emissions, requires operation and maintenance of the regenerative thermal oxidizer, compliance testing of the regenerative thermal oxidizer, and operation and maintenance of the baghouse, as well as operational requirements for solvents, cleaning solutions, and cleaning cloths. This Operating Permit does not contain the compliance testing requirement, as this was satisfied on June 13, 2007.

**New Source Performance Standards (NSPS) Applicability**
40 CFR Part 60, Subpart QQ, Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing
This subpart does not apply to the installation. The installation performs lithographic printing, not rotogravure printing.

40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
This regulation does not apply to the emergency spark ignition engine because the engine was installed prior to 2006.

**Maximum Achievable Control Technology (MACT) Applicability**
40 CFR 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry
This subpart applies to rotogravure and wide-web flexographic printing presses. This installation performs lithographic printing, therefore this regulation does not apply.

40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
The emergency generator is powered by a 195 hp spark ignition, natural gas fired engine that is subject to this regulation. The unit is operated as an emergency generator, and meets the definition of existing as defined by this rule.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**
40 CFR part 61, Subpart M, National Standards for Asbestos is applied in the Core Permits Requirements section of this permit.

**Other Regulatory Determinations**
Stack Testing requirement of Construction Permit #012007-013
Compliance testing was conducted June 13, 2007 by Air Analysis, Inc. (AAI) by Special Condition #4 of the Construction Permit. The permit was based on the assumption of at least 90% destruction efficiency to control emissions from the presses. The stack test was accepted by the Air Pollution Control Program on November 6, 2007, with the results shown below:
<table>
<thead>
<tr>
<th>Run #</th>
<th>% DE</th>
<th>Emission Rate (lb/hr)</th>
<th>RTO Temperature</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>98.24</td>
<td>1.50</td>
<td>1370</td>
</tr>
<tr>
<td>2</td>
<td>98.09</td>
<td>1.50</td>
<td>1360</td>
</tr>
<tr>
<td>3</td>
<td>98.29</td>
<td>1.51</td>
<td>1357</td>
</tr>
<tr>
<td>Avg.</td>
<td>98.2</td>
<td>1.50</td>
<td>1362</td>
</tr>
</tbody>
</table>

The acceptance letter states that the RTO must be operated at or above this average temperature at all times.

10 CSR 10-6.400-Restriction of Emission of Particulate Matter From Industrial Processes

The paper trim collection system is exempt from this rule per 6.400(1)(B)16., as the uncontrolled potential emissions are less than the limit imposed by the rule, as shown below:

<table>
<thead>
<tr>
<th>EP #</th>
<th>MHDR (tons/hr)</th>
<th>Emission Factor (lbs/ton)</th>
<th>Uncontrolled Potential Emissions (lb/hr)</th>
<th>Emission Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP04</td>
<td>8</td>
<td>0.105</td>
<td>0.84</td>
<td>16.5</td>
</tr>
</tbody>
</table>

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

This regulation applies to all sources of visible emissions. The emergency generator is exempt per (1)(A). The combustion units are fueled by natural gas, and are exempt per (1)(L). The regulation does apply to the paper trim collection system, EP04. As shown above, this unit has the uncontrolled potential to emit 0.84 lb particulate per hour. These particulate emissions are expected to consist of larger chunks of paper that are not quantifiable in terms of opacity. Therefore, no monitoring or recordkeeping is required for EP04.

Removed Equipment

According to the Intermediate Operating Permit renewal application for this permit, Press #51 discontinued production in July 2008. The unit was disassembled and removed from site. In the previous Operating Permit, this unit was referred to as EU0020. This unit does not appear in this Operating Permit.

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

The draft Part 70 Operating Permit for LSC Communications Inc.-Liberty was placed on public notice as of January 27, 2017 for a 30-day comment period. The public notice was published on the Department of Natural Resources’ Air Pollution Control Program’s web page at: http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm.

On February 17, 2017 the Air Pollution Control Program received comments from Mark Smith, EPA Region 7. The comments are addressed below in the order in which they appear within the letter.

******************************************************************************

Comment #1: Permit Condition 1 incorporates applicable special conditions from Permit to Construct #012007-013, issued January 22, 2007. This construction permit established synthetic minor volatile organic compounds (VOC) and hazardous air pollutant (HAP) limits; through the use of Regenerative Thermal Oxidizer (RTO) with a destruction/removal efficiency of ninety percent (90%). The destruction/removal efficiency was verified in a one-time emissions test conducted within 180 days of construction permit issuance (completed June 13, 2007 per Statement of Basis). EPA is concerned with the use of an efficiency determination conducted over ten (10) years ago and EPA recommends MDNR use the authority granted in 10 CSR 10-6.065(6)(C)1 and 10 CSR 10-6.065(6)(C)1.C.(I) and include a requirement for LSC-Liberty to confirm the RTO destruction/removal efficiency within one (1) year of operating permit issue. EPA also recommends MDNR include a requirement to conduct repeat efficiency confirmation testing at least once during the term of the operating permit going forward.

Response to Comment #1: Combustion temperature is the main variable affecting performance that can change over time. Since the installation is required to maintain the temperature established during testing, and also required to maintain the RTO unit according to manufacturer’s specifications, the performance of the unit is expected to remain consistent over time. Therefore, repeat testing of the RTO unit is not required in this permit.

Comment #2: Permit Condition 4 incorporates applicable requirements from 10 CSR 10-6.220-Restriction of Emissions of Visible Air Contaminants; for the pneumatic transfer system. Emission Limitation 1 identifies the “owner or operator” as the individual with compliance responsibility and Emission Limitation 2 indicates “a person” as responsible. MDNR customary practice is to refer to the “permittee” in operating permit requirements and EPA recommends MDNR follow customary convention.

Response to Comment #2: The recommended changes have been incorporated into the permit.

Comment #3: LSC-Liberty has accepted synthetic minor permit limits for VOC and HAPs to avoid operating under a Part 70 operating permit and therefore LSC-Liberty is considered an area source of HAPs. Permit Condition 5 incorporates applicable requirements from 40 CFR Part 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines related to an emergency backup generator. MDNR relies on EPA for the compliance management of area HAP sources including those associated with 40 CFR part 63, Subpart ZZZZ. EPA recommends MDNR clearly
stipulate, in the reporting requirements of Permit Condition 5, that compliance reports shall be sent to Missouri Air Compliance Coordinator at EPA Region 7, with MDNR receiving copies as necessary.

**Response to Comment #3:** Reporting requirement 3 has been added to the permit condition to clarify the reporting as recommended.

**Comment #4:** The draft operating permit on public notice is being issued to LSC Communications, Inc.-Liberty, based on an Application for Authority to Operate submitted by R.R. Donnelley-Kansas City-formerly Banta-Kansas City and received by MDNR on March 4, 2013. Previous permits issued to Banta Publications-Kansas City indicate that this facility was also known as Clark Printing Company. With a single facility being identified by four (4) different names over the past twenty (20) years, EPA recommends MDNR provide a brief ownership history in the installation description in the Statement of Basis.

**Response to Comment #4:** A brief ownership history has been included in the Statement of Basis.
Mr. Richard E. Johnson  
LSC Communications, Inc-Liberty  
3401 Heartland Drive  
Liberty, MO 64058

Re: LSC Communications, Inc-Liberty, 047-0122  
Permit Number: OP2017-022

Dear Mr. Johnson:

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/nwj

Enclosures

PAMS File: 2013-03-011