

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

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

www.dnr.mo.gov

APR 06 2015

Mr. John O. Bell
Ovid Bell Press
P.O. Box 370
Fulton, MO 65251

Re: Ovid Bell Press, 027-0003
Permit Number: **OP2014-042**

Dear Mr. Bell:

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM


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

MJS/dmk

Enclosures

c: Northeast Regional Office
PAMS File: 2014-01-049



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: *OP2014-042*
Expiration Date: **APR 06 2020**
Installation ID: **027-0003**
Project Number: **2014-01-049**

Installation Name and Address

Ovid Bell Press
1201 Bluff Street
Fulton, MO 65251
Callaway County

Parent Company's Name and Address

Walsworth Publishing
306 North Kansas Avenue
Marceline, MO 64658

Installation Description:

Ovid Bell Press, Incorporated is a printing press installation located in Fulton, Missouri. The Potential to Emit (PTE) for the entire installation has been conditioned by Air Pollution Control Program Construction Permit# 042006-007 to be less than 100 tons per year of volatile organic compounds (VOCs), 10 tons of any single Hazardous Air Pollutant (HAP) and 25 tons per year of aggregate HAPs.

Prepared by:
Don Murphy
Operating Permit Unit

Director or Designee
Department of Natural Resources

APR 06 2015

Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Ovid Bell Press, Incorporated is a printing press installation located in Fulton, Missouri. The Potential to Emit (PTE) for the entire installation has been conditioned by Air Pollution Control Program Construction Permit# 042006-007 to be less than 100 tons per year of volatile organic compounds (VOCs), 10 tons of any single Hazardous Air Pollutant (HAP) and 25 tons per year of aggregate HAPs.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2013	2012	2011	2010	2009
Particulate Matter \leq Ten Microns (PM ₁₀)	0.04	0.00	0.04	0.04	0.00
Particulate Matter \leq 2.5 Microns (PM _{2.5})	0.04	0.00	0.04	0.04	0.00
Sulfur Oxides (SO _x)	0.00	0.00	0.00	0.00	0.00
Nitrogen Oxides (NO _x)	0.48	0.00	0.48	0.48	0.00
Volatile Organic Compounds(VOC)	55.60	0.00	55.60	55.60	0.00
Carbon Monoxide (CO)	0.40	0.00	0.40	0.40	0.00
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
*Hazardous Air Pollutants (HAPs)	0.00	0.00	0.00	0.00	0.00
Ammonia (NH ₃)	0.00	0.00	0.00	0.00	0.00

*The installation reported HAP emissions as VOC in accordance with 10 CSR 10-6.110.

EMISSION UNITS WITH UNIT SPECIFIC LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EP-26/27	38" Lithographic Web Press with two natural gas-fired dryers.
EP - 29	Dryer, Web 2 – Press
EP - 31	Dryer, Web 3 - Press

EMISSION UNITS WITHOUT UNIT SPECIFIC LIMITATIONS

The following list provides a description of the equipment, which do not have unit specific limitations at the time of permit issuance but count towards the facility wide emission limit outlined in Permit Condition PW001.

Emission UNIT ID	Type of Equipment	Location	Manufacturer
EP-02	Natural Gas fired Cast Iron Boiler	Boiler - Basement	Weil McClain
EP-03 to EP-18	Natural Gas Fired Furnaces	Various locations	
EP-22	Sheetfed Press	Miller Press Room	Miller
EP-23	Sheetfed Press	Miller Press Room	Miller
EP - 28	Splicer	Web 2 - Press	Butler
EP - 28	Infeed	Web 2 - Press	Butler
EP - 28	Print Unit (1)	Web 2 - Press	Hantcho

EP - 28	Print Unit (2)	Web 2 - Press	Hantcho
EP - 28	Print Unit (3)	Web 2 - Press	Hantcho
EP - 28	Print Unit (4)	Web 2 - Press	Hantcho
EP - 28	Chill Tower	Web 2 - Press	Hantscho
EP - 28	Coater	Web 2 - Press	Worldwide
EP - 28	UV Dryer	Web 2 - Press	Prime
EP - 28	QC4 Folder	Web 2 - Press	Harris
EP - 28	Folder/Sheeter	Web 2 - Press	Innotech
EP - 28	Stacker	Web 2 - Press	Butler
EP - 28	Stacker	Web 2 - Press	A & B
EP - 28	CLC Unit	Web 2 - Press	WPC
EP - 30	Splicer	Web 3 - Press	Butler
EP - 30	Infeed	Web 3 - Press	Harris
EP - 30	Print Units (1)	Web 3 - Press	Harris
EP - 30	Print Units (2)	Web 3 - Press	Harris
EP - 30	Print Units (3)	Web 3 - Press	Harris
EP - 30	Print Unit (4)	Web 3 - Press	Harris
EP - 30	Chill Tower	Web 3 - Press	Harris
EP - 30	QC4 Folder	Web 3 - Press	Harris
EP - 30	150 OL Stacker	Web 3 - Press	STI
EP - 30	CLC Unit	Web 3 - Press	WPC

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

PERMIT CONDITION PW001

10 CSR 10-6.060 *Construction Permits Required*

Air Pollution Control Program Construction Permit 042006-007

This permit condition applies to all emission units located at the facility including sources listed above under Emission Units Without Unit Specific Limitations.

Emission Limitation:

- 1.) The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOCs) from the installation in any consecutive 12-month period. [\[Special Condition 2.A\]](#)
- 2.) The permittee shall emit less than ten (10) tons individually and twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the installation in any consecutive 12-month period. [\[Special Condition 2.B\]](#)

Monitoring/Recordkeeping:

- 1.) Attachment A, Attachment B, and Attachment C or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the annual 100 ton VOC and 10/25 ton HAP limits. [\[Special Condition 2.C\]](#)
- 2.) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used at this installation. [\[Special Condition 2.C\]](#)

Operational Limitation:

Solvent/Ink Cloths - The permittee shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment. [\[Special Condition 3\]](#)

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the required records indicate that the source exceeds the VOC and HAP limitations. [\[Special Condition 2.D\]](#)

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

PERMIT CONDITION 1	
10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants	
EQ Reference	Unit Description
EP26/27	38" Lithographic Web Press with two 2.4 MMBTU natural gas-fired dryers.
EP - 29	Dryer ,Web 2 - Press
EP - 31	Dryer, Web 3 - Press

Emission Limitation:

- 1.) No owner or other person shall 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: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1.) The permittee shall conduct a visual emission observation on this emission unit once a month using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions were observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2.) Should a violation be observed, monitoring frequency will progress in the following manner:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after the date of the initial violation. Should no violation of this regulation be observed during this period, then,
 - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period, then,
 - c) Observations must be made once per month.
- 3.) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1.) The permittee shall maintain records of all observation results (see Attachment D or E), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,

- b) All emission units from which visible emissions occurred, and
- c) Whether the visible emissions were normal for the process.
- 2.) The permittee shall maintain records of any equipment malfunctions. (see Attachment F)
- 3.) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment E)
- 4.) Attachments D, E, and F contain example logs to assist in compliance with these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5.) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6.) All records shall be maintained for five years.

Reporting:

- 1.) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2.) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 3) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 4) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and

- j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 Section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

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

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as

used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(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 Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

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

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
- a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

The application utilized in the preparation of this permit was signed by Mr. John O. Bell, Chief Executive Officer. 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) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment E - Method 9 Opacity Emissions Observations

Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY

Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? ___ YES ___ NO

 Signature of Observer

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received June 27, 2012; revised January 22, 2014;
- 2) Previously submitted Emissions Inventory Questionnaires; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Air Pollution Control Program Construction Permit 0594-002
- 5) Air Pollution Control Program Construction Permit 042006-007

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit Revisions

The following construction permits have been issued to this installation:

Permit Number	Description	Notes
0594-002	38" lithographic web press with two 2.4 MMBtu/hr natural gas dryers	Special Conditions were superseded by Construction Permit 042006-007
0296-017	5-unit, 5 color web press install a new 5-unit, 5-color 38" Hantscho Mark IV lithographic web press with one 3.3 MMBtu natural gas-fired dryer	No Special Conditions associated with this permit
0897-011	Install a two (2) color units to the existing 2-unit Hantscho Mark IV Lithographic Web Press permitted in 0594-002.	Special Conditions were superseded by Construction Permit 042006-007
042002-017	Installation of a six (6) unit lithographic sheet-fed press	
042006-007	Installation of an 8-unit, 4-color heatweb lithographic web press	Special Conditions located in Permit Condition PW001

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

Construction Permits 0594-002 & 0897-011

This Construction Permit as for the addition of 2 units to an existing 2-unit Hantscho Mark IV Lithographic Web Press permitted in 0594-002. This should have been considered a permit modification and superseded the permit

conditions of 0594-002 since it was a modification to an existing unit and the permit had placed a 100 ton VOC limit facility wide. The Special Conditions of 0897-011 (and 0594-002 for this reason) were superseded by Construction Permit 042006-007 and therefore not included in this permit.

Construction Permit 042006-007, Issued April 18, 2006

Special Conditions 4. A and 4.B simply restate the requirements of 10 CSR 10-6.165, and are not included in Permit Condition PW001 for brevity. A summary of this language is located in the Core Permit Requirements section of this permit.

New Source Performance Standards (NSPS) Applicability

None.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR 63 Subpart KK - *National Emission Standard for the Printing and Publishing Industry*

The facility is an area source for HAP and exempt per §63.820(a)(2). The facility also uses lithographic presses which are not covered under the standard.

40 CFR Part 63, Subpart JJJJJ—*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*

§63.11237 defines a boiler as an enclosed device using controlled flame combustion in which water is heated to recover thermal energy in the form of steam and/or hot water. Controlled flame combustion refers to a steady-state, or near steady-state, process wherein fuel and/or oxidizer feed rates are controlled. The Natural Gas fired Cast Iron Boiler (EP-02) is the only boiler at this facility and it burns exclusively natural gas, and is exempt from this standard per §63.11195(e).

Other Regulatory Determinations

10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*

An indirect heating source is defined under the applicability section in 10 CSR 10-6.405(1)(B) as a source in the products of combustion do not come into direct contact with process materials. The Natural Gas fired Cast Iron Boiler (EP-02) is the only indirect heating source at this facility that meets that description, and it combusts only natural gas and is exempt from this rule per 10 CSR 10-6.405(1)(E).

Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	9.04
CO _{2e}	12,532
HAP	<10/25
NO _x	11.80
PM ₁₀	0.96
PM _{2.5}	0.79
SO _x	0.07
VOC	<100

¹PTE from Construction Permit 042006-007, adjusted to include some small natural gas combustion sources reported in the EIQ but not previously included. Construction Permit 042006-007 contains facility-wide limitations to less than 100 ton/yr of VOC and 10/25 ton/yr of HAP (*See Plantwide Permit Condition PW001*). The PTE for PM_{2.5} was not included in Construction Permit 042006-007, and was estimated for this table using emission factors from US EPA FIRE for SCC 10300603, based on combustion sources reported at the facility (0.0238 mmscf/hr) and 8760 hours/year.

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

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

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

MEMORANDUM

DATE: November 10, 2014

TO: 2014-01-049 File

FROM: Don Murphy, Environmental Engineer

SUBJECT: Response to Public Comments

A draft of the Intermediate Operating Permit for the Ovid Bell Press was placed on public notice September 17, 2014, by the Missouri Department of Natural Resources (MDNR). A comment was received on September 22, 2014 from Pete Muzio, Northeast Regional Office regarding historical issues with visible emissions arising from the press dryers. To address this issue, provisions from 10 CSR 10-6.220 were placed into the permit along with monitoring and recordkeeping requirements, to ensure that the facility is in compliance with the visible emissions standard.

Comments were also received from Leslye E. Werner, Acting Air Permitting and Compliance Branch Chief at Environmental Protection Agency Region 7 on October 1, 2014. The four comments are presented below as submitted, with the response to each comment by the Air Pollution Control Program (APCP) directly following.

Comment 1. 1) Ovid Bell Press was issued Permit to Construct #0594-002 on May 3, 1994 and this construction permit authorized the installation of a new 38" lithographic web press with two (2) 2.4 MMBtu/Hr.natural gas-fired dryers. This new press was an addition to an existing facility that already contained seven (7) sheet-fed presses and associated space heaters. Permit to Construct #0594-002 also updated the Ovid Bell Press potential-to-emit (PTE) for all criteria air pollutants and shows that after project pollutants of concern to be volatile organic compounds (VOCs) with a PTE of 34.75 tons per year (tpy) and hazardous air pollutants (HAPs) with a PTE of 16.07 tpy. Effective February 21, 1996, Ovid Bell Press was issued another Permit to Construct (#0296-017) which approved the construction of a 5-unit, 5-color lithographic web press with one (1) 3.3 MMBtu/Hr. natural gas-fired dryer. The PTE of VOCs and HAPs at the Ovid Bell Press installation increased with the addition of this new press and are reported to be 51.76 tpy VOCs and 17.75 tpy HAPs. On August 4, 1997, Ovid Bell Press is authorized by Permit to Construct #0897-011 to install two (2) color units to an existing 2-Unit lithographic web press. This addition caused an increase in the PTE of VOCs by 60.32 tpy and an increase in the PTE of HAPs by 17.08 tpy. Therefore, concurrent with the equipment addition, Ovid Bell Press requested and was granted a voluntary VOC and HAP emission limitation of 100 tpy and 10/25 tpy, respectively. These voluntary emission limitations preclude Ovid Bell Press from having to apply for a Title V (Part70) operating permit and allow the facility to continue to operate under an Intermediate State Permit to Operate. With these voluntary limits, Ovid Bell Press accepts their maximum PTE for VOCs to be no greater than 100 tpy and HAPs to be no greater than 10/25 tpy. Potential to emit (PTE), by definition, is the annual potential based on

maximum annual-rated capacity of the installation. Installation is defined as all source operations including activities that result in fugitive emissions that belong to the same industrial grouping located on one or more contiguous or adjacent properties and under control of the same person. Therefore, all of the source operations as of August 4, 1997 when added together shall not emit more than 100 tpy VOCs and 10/25 tpy HAPs.

Subsequently, Ovid Bell Press, Inc. is issued Permit to Construct 042002-017; effective April 6, 2002, and Permit to Construct 042006-007; effective April 18, 2006. Permit #042002-017 authorized the installation of a six unit lithographic sheet fed press with a VOC PTE of 19.35 tpy and a HAP PTE of 1.14 tpy. Permit 042006-007 authorized the installation of an 8-unit, 4-color heat web lithographic web press with a VOC PTE of 25.18 and a HAP PTE of 0.36 tpy.

Therefore, the total installation PTE is in excess of the voluntary emission limitations established in 1997. However, MDNR re-establishes an identical voluntary emission limitation with both Permit #04002-017 and 042006-007. Based on MDNR definitions, the emission limit was established in 1997 and so therefore the installation of the 2002 press and the 2006 press now define Ovid Bell Press as a Part 70 installation. Therefore, EPA suggest MDNR should be issuing a Part 70 operating permit for Ovid Bell Press and not renewing an Intermediate State permit to Operate.

APCP Response:

10 CSR 10-6.020(2)(I).23 defines Intermediate installations as Part 70 installations that become basic state installations based on their potential to emit by accepting the imposition of voluntarily agreed- to federally-enforceable limitations on the type of materials combusted or processed, operating rates, hours of operation, or emission rates more stringent than those otherwise required by rule or regulation. The draft operating permit contains the “voluntarily agreed- to federally-enforceable limitations” as described in the definition, therefore is receiving the proper permit. No changes to the draft were made in regards to this comment.

Comment 2.) The Other Regulatory Determinations section in the Statement of Basis says 10 CSR 10-6.405; Restriction of PM Emissions From Fuel Burning Equipment Used for Indirect Heating only applies to a natural gas-fired Cast Iron Boiler (EP02) as it is the only indirect heating source at the facility and it combusts only natural gas and is exempt from rule per 10 CSR 10-6.405. Permit to Construct 0594-002 authorized installation of two (2) 2.4 MMBtu/Hr. natural gas-fired dryers and the existing facility included several space heaters. Permit to Construct 0296-017 authorized the installation of one (1) 3.3 MMBtu/Hr. natural gas-fired heater and Permit to Construct 042006-007 authorized installation of two (2) natural gas-fired dryers each rated at 6.6 MMBtu/Hr. Therefore, it appears that there may be more than a cast iron boiler subject to 10 CSR 10-6.405 and EPA suggests MDNR may wish to revise the Statement of Basis regarding the discussion of other regulatory determinations in respect to 10 CSR 10-6.405.

APCP Response:

The Statement of Basis was edited to clarify that the 10 CSR 10-6.405; *Restriction of PM Emissions From Fuel Burning Equipment Used for Indirect Heating* applies to indirect heating sources where the products of combustion do not come into direct contact with process materials and does not apply to direct heating sources such as dryers and space heaters.

Comment 3.) The Installation Description and Equipment Listing in Section I indicates emission unit EP26/27 is an emission unit with specific limitations. However, this draft operating permit has only one permit condition and is a plant wide permit condition. Section III: Emission Unit Specific Emission Limitations indicates there are "none" associated with this operating permit. There appears to a discrepancy between Section I and Section III and EPA suggests MDNR should resolve.

APCP Response:

Provisions from 10 CSR 10-6.220 were placed into the permit applicable to the referenced emission unit and the other press dryers located at the facility.

Comment 4.) Permit condition PW001 establishes a voluntary emission limitation of less than 100 tons of volatile organic compounds (VOCs) for the entire installation in any consecutive 12-month period. PW001 also establishes voluntary emission limitations of less than 10 tons of any individual hazardous air pollutant (HAP) in any 12-month consecutive period and less than 25 tons of any combination of hazardous air pollutants (HAPs) in any 12-month consecutive period. PW001 approves the use of Attachment A (Monthly VOC Tracking Record) to accurately demonstrate compliance with the 100 ton per 12-month period VOC voluntary limit. Additionally, permit condition PW001 approves the use of Attachments Band C to accurately demonstrate compliance with the HAP 10/25 tons per 12-month consecutive period voluntary limit. However, permit condition PW001 fails to ensure that the VOC; the individual HAP; and the total combined HAP emissions, respectively, will be below their established voluntary limits. While the draft operating permit intends to restrict VOC and HAP below the individual voluntary limits, these limits are not enforceable as a practical matter.

To effectively limit Ovid Bell Press VOC, individual HAP and total HAP emissions to less than 100, 10 and 25 tpy, respectively, as specified, the VOC, individual and total HAP emission limits of PW001 must apply at all times to all actual emission units, and all actual VOC, individual and total HAP emission units must be considered in determining compliance with the respective limits. The draft permit for Ovid Bell Press states that "the total of all VOCs; the total of all HAPs emissions and any individual HAP emissions from the facility, shall be less than 100 tons per year; 10 tons per year and 25 tons per year, respectively, on any rolling twelve-month (12 month) period." However, the draft permit does not specify how the facility's VOC; individual HAP; and total HAP emissions shall be determined or measured for assessing compliance with these VOC; individual HAP; and total HAP emission limits, and it is unclear whether all actual VOC; individual HAP; and total HAP emissions must be considered in determining compliance with these limits. Attachments A, B and C would appear to capture the emissions associated with inks, fountain solutions, blanket wash and type wash. However, there does not appear to be any tracking associated with the VOC emissions and HAP emissions from other sources such as combustion.

The EPA notes that the draft permit does contain a condition in PW001 providing that the "permittee shall calculate and record the total of all VOCs; total of all HAPs; and all individual HAP emissions from the facility on a monthly and rolling twelve-month (12-month) basis. However, the Seitz memo of June 13, 1989 titled: *Guidance on Limiting Potential to Emit ill New Source Permitting*; indicates that "if the permitting agency determines for a particular surface coating operation that operating and production parameters (e.g. gallons of coating,

quantities produced) are not readily limited due to wide variety of coatings and products and due to the unpredictable nature of the operation, emission limits coupled with a requirement to calculate daily emissions may be used to restrict potential to emit." EPA Region 7 contends that this line of reasoning applies to the use of various volatile materials that are not subject to easily limited annual use in the printing industry as well as its applied use in the surface coating industry.

Moreover, as defined for purposes of determining the potential-to-emit (PTE) of a stationary source of VOCs and HAPs, the PTE shall encompass the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Thus, emission for all emission units that are part of the source's physical and operational design (entire installation) must be included in calculating PTE for purposes of determining VOC and HAP voluntary limitation compliance, including emission units that have been designated as without limitations and any designated insignificant activities. Similarly, EPA has previously explained that when a source accepts a source-wide limit for a pollutant, all actual emission of that pollutant from the source must be considered in determining compliance with the limit.

EPA recommends MDNR revise PW001 in the Intermediate State Permit to Operate for Ovid Bell Press--Fulton to ensure the source-wide VOCs; the source-wide total HAPs and individual HAP emission limits of 100 tons per 12-month period; 25 tons per 12-month period and 10 tons per 12-month period, respectively, are enforceable. MDNR should clarify in the operating permit that those limits apply at all times to all actual source-wide VOC; total HAP and individual HAP emissions and that all actual VOC; total HAP and individual HAP emission units must be considered in determining compliance with those limits. MDNR should also make any changes or clarifications necessary to the measures for determining compliance with those limits, including monitoring, recordkeeping, and reporting provisions, to ensure that those limits are enforceable as a practical matter. In identifying in the operating permit the measures for determining compliance with the VOC; individual HAP; and total HAP emission limits, MDNR should specify how the actual annual total VOC; total HAP and individual HAP emissions will be calculated, including what, if any, emission rates or emission factors would be used and how calculations using such rates would ensure that actual annual total VOC; total HAP and individual HAP emissions remain below the respective 100; 25 and 10 ton per year limits.

APCP Response

The APCP believes that it would be unnecessarily burdensome to require daily tracking of VOC to satisfy the annual 100 ton VOC and 10/25 ton HAP limit. However, the tracking sheets were revised to provide a better example of required emissions tracking to demonstrate compliance with the plantwide emission limits in Permit Condition PW001.