



Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2013-039
Expiration Date: JUN 20 2018
Installation ID: 189-1520
Project Number: 2007-08-014

Installation Name and Address

F & S Printing
10430 Midwest Industrial Blvd.
Olivette, MO 63132
St. Louis County

Parent Company's Name and Address

F & S Printing
10430 Midwest Industrial Blvd.
Olivette, MO 63132

Installation Description:

F & S Printing is a printing facility in St. Louis County that consists of three (3) flexographic printing presses and ink clean-up operations. The facility prints on plastic bags. Potential emissions of VOC are above major levels, however the facility has taken a voluntary limit on VOC and HAPs in order to obtain this Intermediate operating permit.

JUN 21 2013

Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

F & S Printing is a printing facility in St. Louis County that consists of three (3) flexographic printing presses and ink clean-up operations. The facility prints on plastic bags. Potential emissions of VOC are above major levels, however the facility has taken a voluntary limit on VOC and HAPs in order to obtain this Intermediate operating permit.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2011	2010	2009	2008	2007
Particulate Matter ≤ Ten Microns (PM ₁₀)	---	---	---	---	---
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	---	---	---	---	---
Sulfur Oxides (SO _x)	---	---	---	---	---
Nitrogen Oxides (NO _x)	---	---	---	---	---
Volatile Organic Compounds(VOC)	48.51	66.99	51.60	61.13	67.00
Carbon Monoxide (CO)	---	---	---	---	---
Lead (Pb)	---	---	---	---	---
Hazardous Air Pollutants (HAPs)	---	---	---	---	---
Ammonia (NH ₃)	---	---	---	---	---

EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU001	Flexographic Printing Presses
EU003	Clean Up Solvent Use

EMISSION UNITS WITHOUT LIMITATIONS

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

<u>Description of Emission Source</u>
Solvent Recovery System
Natural Gas Dryer

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 10-6.020(2)(I)24. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)
10 CSR 10-6.060 Construction Permits Required
Construction Permit 6831, 6832, 6833, Issued November 22, 2002

Emission Limitation:

- 1) This installation shall not emit more than 100 tons of VOC per year on a twelve (12)- month rolling basis. [Special Condition 1]
- 2) This installation shall not emit more than 25 tons of total HAPs per year on a twelve (12)- month rolling basis. [Special Condition 1]
- 3) This installation shall not emit more than ten tons of an individual HAP per year on a twelve (12)- month rolling basis. [Special Condition 1]

Monitoring/Recordkeeping:

F & S Printing shall maintain monthly records of all VOC and HAP containing materials utilized at the installation on the forms provided (Attachments A, B, C). The forms shall be completed within ten (10) days of the end of each calendar month, maintained on site for the latest sixty (60) month period and made available to the St. Louis County program manager, or the designated agent, at any time. [Special Condition 2]

Reporting:

Should records indicate that a violation of any of the limits established by Condition 1 (above) has occurred, F & S Printing shall notify the St. Louis County Program Manager, 6121 N. Hanley Road, Berkeley, MO 63134, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, by no later than the next working day. [Special Condition 2]

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.

EU001 & EU003 - Flexographic Printing Presses and Solvent Clean Up		
Emission Unit	Description	2011 EIQ Reference #
EU001	(2) color CMF Europa Duoflex; MHDR=4.54 lb VOC/hr (6) color CMF Europa Beta; MHDR = 4.54 lb VOC/hr (8) Color Bobst Group Alpha; MHDR = 6.81 lb VOC/hr	EP001
EU003	Clean Up Solvent Use	EP003

PERMIT CONDITION (EU0010 and EU0030)-001 10 CSR 10-5.340, Control of Emissions From Rotogravure and Flexographic Printing Operations
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Emission Limitations:

- 1) No owner or operator shall use or permit the use of any of the following flexible packaging printing presses unless they are equipped with a control device. The control device shall remove, destroy, or prevent the emission of VOCs into the ambient air by at least the percentage indicated by weight of the uncontrolled VOC emissions on a daily weighted basis.

Flexible Package Printing Press First Installed	VOC Control Device First Installed	VOC Control Percentage
Prior to March 14, 1995	Prior to March 1, 2012	65
Prior to March 14, 1995	On or after March 1, 2012	70
On or after March 14, 1995	Prior to March 1, 2012	75
On or after March 14, 1995	On or after March 1, 2012	80

- 2) Low solvent technology may be used to achieve VOC emission reductions instead of the above methods. If low solvent technology is used, all inks, coating, and adhesives combined must meet one of the following limits for each press:
 - a) Contain no more than 0.8 pounds of VOC per pound solids applied; or
 - b) Contain no more than 0.16 pounds of VOC per pound materials applied.
- 3) No owner or operator of any applicable printing press shall perform a cleaning operation that uses cleaning solvents containing VOCs unless
 - a) The cleaning solvents are kept in tightly-covered tanks or containers during transport and storage;
 - b) The used cleaning cloths contaminated with the cleaning solvents were placed in tightly-closed containers while awaiting off-site transportation. The cleaning cloths shall be properly cleaned and disposed of; and
 - c) An owner or operator may use an alternate method for reducing cleaning solvent VOC emissions, including the use of low VOC cleaning solvents, if the owner or operator shows the emission reduction is equal to or greater than the options above.

Monitoring/Recordkeeping:

- 1) If an add-on control device is used to meet the requirements of this rule, the following parameters shall be monitored and recorded to determine compliance with the applicable provisions of this rule:
 - a) Operating temperature of all VOC destruction devices monitored on a continuous basis while a connected printing press is operating and logged at least once every fifteen minutes. The operating temperature is the gas temperature upstream of the catalyst bed for catalytic oxidizers and the oxidizer operating temperature for thermal and regenerative oxidizers.
 - b) VOC breakthrough on a carbon adsorption unit on a continuous basis;
 - c) Results of all emissions testing and inspections of control equipment as required;
 - d) Maintenance, repairs, and malfunction of any air pollution control equipment when performed; and
 - e) The cumulative amount of VOC recovered during a calendar month for all VOC recovery equipment.
- 2) If low solvent technology is used to achieve VOC emission reductions, for each ink formulation used, the following shall be recorded for each press to determine continuous compliance:
 - a) Volume-weighted ink VOC content in percent by volume for each ink formulation as applied on a monthly basis; and
 - b) Results of ink testing as required when performed, manufacturer's formula specification sheet, or MSDS for each ink purchased.

Performance Testing:

An initial emission test shall be performed after any required control equipment is installed. Testing and compliance demonstrations shall follow the procedures contained in 10 CSR 10-6.030(14)(A) and 10 CSR 10-6.030(20).

Reporting:

Should records indicate that a violation of any of the limits established above has occurred, F & S Printing shall notify the St. Louis County Program Manager, 6121 N. Hanley Road, Berkeley, MO 63134, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, by no later than the next working day.

PERMIT CONDITION (EU0010 and EU0030)-002

10 CSR 10-5.340, Control of Emissions From Rotogravure and Flexographic Printing Operations
Compliance Plan, Approved by St. Louis County Health on April 15, 2013

Note: F & S Printing cannot currently meet the requirements of using low solvent technology to achieve VOC emissions reductions required by 10 CSR 10-5.340 (Permit Condition EU0010-EU0030)-001. The facility has developed a plan to achieve compliance which was approved by the St. Louis County Health Department on April 15, 2013. The following conditions are contained in the approved compliance plan. If the facility attains compliance with the regulation through the use of low solvent technology or the use of a control device during the life of this permit, then Permit Condition (EU0010 and EU0030)-002 will become applicable.

Operational Limitations:

- 1) F & S Printing will work to develop a compliant ink to use in the printing presses according to the plan submitted to and approved by the St. Louis County Health Department. This plan is included with this permit as Attachment D.

- 2) If F & S Printing has not made significant progress in developing a compliant low solvent ink by October 1, 2013, F & S Printing shall request a variance to the rule following all the procedures in the St. Louis County Air Pollution Control Code Chapter 612 Section 090 Board to Consider Appeal. A variance from the rule, if granted, should allow F & S Real Estate to continue to operate noncompliant for one year, during which a compliant low solvent ink shall be developed or F & S requests the Missouri Department of Natural Resources to amend the rule. (Compliance Plan, Condition 4)

Recordkeeping:

- 1) F & S Printing shall document each low volatile organic compound trial ink. (Consent Agreement, Condition 1)
- 2) F & S Printing shall keep the following records in accordance with 10 CSR 10-5.340(4)(B): (Consent Agreement, Condition 3)
 - a) Ink formulation used for all inks – compliant or not;
 - b) For each press record the VOC content in percent for each ink formulation used on a monthly basis;
 - c) Results of ink testing as required in section (5)(B) of the rule when performed, manufacturer's formula specifications sheet or MSDS for ink purchased.

Reporting:

F & S Printing shall report to the Air Pollution Control Program by the 10th of each month beginning on May 10, 2013, as to the progress that has been made in the development of low VOC solvent inks and submit the form for each trial ink tested during the reporting period. (Consent Agreement, Condition 2)

PERMIT CONDITION EU003-003

10 CSR 10-6.060 Construction Permits Required
Construction Permit #6831, 6832, and 6834, Issued November 22, 2002

Operational Limitation:

- 1) All ink solvent and cleaning agents shall be kept in sealed containers whenever they are not in use. Each sealed container shall indicate its content with permanent, easily read markings [Special Condition 4]
- 2) Any cleaning cloths/rags using VOC or HAP containing materials shall be stored in sealed containers when not in use and awaiting off-site transport. [Special Condition 5]

Reporting:

Should records indicate that a violation of any of the limits established above has occurred, F & S Printing shall notify the St. Louis County Program Manager, 6121 N. Hanley Road, Berkeley, MO 63134, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, by no later than the next working day.

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) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) F & S Printing may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if F & S Printing fails to comply with the provisions or any condition of the open burning permit.
- a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-6.050 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 10-6.100 Alternate Emission Limits

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

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

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

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170 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 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

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

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

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

10 CSR 10-6.165 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 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.

- d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with 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's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Boulevard, 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 Robert Freund, President. 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 A

This form or an equivalent form may be used to record the data required by this permit to demonstrate compliance with the VOC emissions limitations throughout the operating permit.

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

Copy this sheet as needed

Column A	Column B (a)	Column C	Column D	Column E
Material Used (Name, Type)	Amount of Material Used (Include Units)	Density (lbs/gal)	VOC Content (Weight %)	VOC Emissions (tons)
(b) Total VOC Emissions Calculated for this Month in Tons:				
(c) 12-Month VOC Emissions Total from Previous Month's Attachment A, in Tons				
(d) Monthly VOC Emissions Total (b) from Previous Year's Attachment A, in Tons				
(e) Current 12-Month Total of VOC Emissions in Tons: [(b) + (c) - (d)]				

- Instructions: Choose appropriate VOC calculation method for units reported:
- (a) 1) If usage is in tons: - [Column B] x [Column D] = [Column E]
 - 2) If usage is in pounds: - [Column B] x [Column D] x [0.0005] = [Column E]
 - 3) If Usage is in gallons: - [Column B] x [Column C] x [Column D] x [0.005] = [Column E]
 - (b) Summation of [Column E] in tons
 - (c) 12-Month VOC emission total (e) from last month's Attachment A, in tons
 - (d) Monthly VOC emissions total (b) from previous year's Attachment A, in tons
 - (e) Calculate the new 12-month VOC emissions total. A 12-month VOC emissions total (e) of less than 100 tons indicates compliance

Attachment B

This form or an equivalent form may be used to record the data required by this permit to demonstrate compliance with the HAP emissions limitations throughout the operating permit.

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

Copy this sheet as needed

Column A	Column B (a)	Column C	Column D	Column E
Material Used (Name, HAP CAS #)	Amount of Material Used (Include Units)	Density (lbs/gal)	HAP Content (Weight %)	HAP Emissions (tons)
(b) Total HAP Emissions Calculated for this Month in Tons:				
(c) 12-Month HAP Emissions Total from Previous Month's Attachment B, in Tons				
(d) Monthly HAP Emissions Total (b) from Previous Year's Attachment B, in Tons				
(e) Current 12-Month Total of HAP Emissions in Tons: [(b) + (c) - (d)]				

- Instructions: Choose appropriate VOC calculation method for units reported:
- (a) 1) If usage is in tons: - [Column B] x [Column D] = [Column E]
 - 2) If usage is in pounds: - [Column B] x [Column D] x [0.0005] = [Column E]
 - 3) If Usage is in gallons: - [Column B] x [Column C] x [Column D] x [0.005] = [Column E]
 - (f) Summation of [Column E] in tons
 - (g) 12-Month HAP emission total (e) from last month's Attachment B, in tons
 - (h) Monthly HAP emissions total (b) from previous year's Attachment B, in tons
 - (i) Calculate the new 12-month HAP emissions total. A 12-month HAP emissions total (e) of less than 25.0 tons indicates compliance

Attachment D Compliance Plan

F & S Real Estate

10655 Midwest Industrial Blvd.
St. Louis, MO 63132
(314) 423-3131
(314) 423-1329 fax

April 2, 2013

St. Louis County
Ms. Kathrina M. Donegan
Air Pollution Control Program Supervisor

Dear Ms. Donegan,

Since we became aware of changes to pollution standards in November, we have attempted to find a solution. We discovered that our building is probably not constructed to allow incineration, so we have started to concentrate on inks.

We had Sun Chemical supply us with a sample of standard water based inks. We printed and presented samples to a couple of customers. They were not satisfied. We sent some samples to an ice bagger, because these inks must stand up to freezing and thawing; they didn't hold up.

The attached letter indicates our plan in coordination with Sun Chemical.

When they deliver the trial ink, we will order film from our suppliers. We will require a higher dyne level than we now use. It degrades quickly, so we will have to print as soon as it arrives. This of course presents logistical issues.

Our plan is to distribute these samples to 6 -8 customers that have various needs. Some will pack in area that has a chemical atmosphere, some will require freezing and thawing. Others may have a gritty environment that abrades the ink.

We will then periodically examine the samples over an 8 – 10 month period. Some customers only buy once a year (or less) and expect the bags to hold up. Thus, the long trial time.

We are also examining the underlying calculations on VOC's to determine whether we are correct. This could have some bearing on the potential VOC's that we are emitting.

Cordially,

Bob Freund
President
F & S Real Estate

Attachment E
Approved Conditions for Compliance Plan

Charlie A. Dooley
County Executive



Dolores J. Gumm,
Dir

April 15, 2013

Mr. Robert Freund, President
F & S Real Estate
10655 Midwest Industrial Blvd.
St. Louis, MO 63132

Dear Mr. Freund,

St. Louis County Air Pollution Control Program has received and reviewed your plan to come into compliance with 10 CSR 10-5.340 *Control of Emissions From Rotogravure and Flexographic Printing Operations*, submitted via email on April 3, 2013. The plan is approved with the following conditions:

1. F & S Real Estate shall document each low volatile organic compound (VOC) trial ink on the attached form or an equivalent form approved by the Air Pollution Control Program.
2. F & S Real Estate shall report to the Air Pollution Control Program by the 10th of each month beginning on May 10, 2013, as to the progress that has been made in the development of low VOC solvent inks and submit the form for each trial ink tested during the reporting period.
3. F & S Real Estate shall keep the following records in accordance with 10 CSR 10-5.40(4)(B) *Reporting and Record Keeping*:
 - a. Ink formulation used for all inks - compliant or noncompliant;
 - b. For each press record the VOC content in percent for each ink formulation used on a monthly basis;
 - c. Results of ink testing as required in section (5)(B) of the rule when performed, manufacturer's formula specifications sheet or MSDS for ink purchased.
4. If F & S Real Estate has not made significant progress in developing a compliant low solvent ink by October 1, 2013, F & S Real Estate shall request a variance to the rule following all the procedures in the St. Louis County Air Pollution Control Code Chapter 612 Section .090 *Board to Consider Appeal*. A variance from the rule, if granted, should allow F & S Real Estate to continue to operate noncompliant for one year, during which a compliant low solvent ink shall be developed or F & S Real Estate requests the Missouri Department of Natural Resources to amend the rule.

F & S Real Estate
April 11, 2013
Page 2

Saint Louis County has reviewed the all applicable information F & S Real Estate has submitted during the permitting process and it appears that F & S Real Estate is subject to 10 CSR 10-5.340(3)B.1.

Should you have any questions or concerns about this approval, please feel free to contact me at 314-615-89836 or via email at kdonegan@stlouisco.com.

Respectfully,



Kathrina M. Donegan, MBA
Supervisor
Air Pollution Control Program

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received July 26, 2007;
- 2) 2011 Emissions Inventory Questionnaire, received May 4, 2012; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition; and
- 4) Construction Permit 6831-6834, Issued November 22, 2002.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, Alternate Emission Limits

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

10 CSR 10-5.442, Control of Emissions From Lithographic and Letterpress Printing Operations

This rule does not apply because according to 10 CSR 10-5.442 (1)(C) this rule does not apply to printing on plastic.

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

This rule does not apply to the clean up operations (EU003) because according to 10 CSR 10-5.455(1)(C)8 the rule does not apply for emission units within the source category including lithographic printing materials.

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

This rule does not apply to the dryer because it is not a source of indirect heat.

Construction Permit Revisions

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

None.

New Source Performance Standards (NSPS) Applicability

None.

Maximum Achievable Control Technology (MACT) Applicability

10 CSR Part 63 Subpart KK, *National Emission Standard for the Printing and Publishing Industry*

This subpart does not apply to this installation because it is not a major source of HAP emissions.

40 CFR Part 63 Subpart JJJJJ, *National Emission Standard for Industrial, Commercial, and Institutional Boilers Area Sources*

This subpart does not apply because the 1.63 MMBtu/hr boiler combusts solely natural gas.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

Greenhouse Gas Emissions

This installation is not a major source for greenhouse gases. At the time of permit issuance, there were no applicable GHG requirements for this source and this source is not subject to the Greenhouse Gas Reporting Rule.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	0.49
CO _{2e}	712.3
HAP	Less than 10 (individual) and 25 (total)
NO _x	0.58
PM ₁₀	0.045
PM ₂₅	0.045
SO _x	0.003
VOC	Less than 100

Emissions of HAP are limited to 10 tpy individual and 25 tpy total. VOC is limited to 100 tpy total. The only emission factor with a source of emissions other than HAP or VOC is a small natural gas boiler. The PTE of the facility was calculated assuming this boiler operated 8760 hours per year.

Other Regulatory Determinations

10 CSR 10-5.340, *Control of Emissions from Rotogravure and Flexographic Printing Operations*
This facility is subject to this regulation which is included in this operating permit as Permit Condition (EU0010-EU0030)-001. This regulation requires the use/installation of a control device or the use of low solvent technology to meet certain VOC emission reductions. To date, the facility has not been able to install control devices due to the layout of the building and/or due to the high cost and has also not been able to find a low solvent ink that will provide their customers with an adequate product. Therefore, this facility is currently not in compliance with this regulation. However, the facility has developed a plan to achieve compliance with this regulation and the St. Louis County Health Department has approved their plan with certain conditions which are included in this operating permit as Permit Condition (EU0010-EU0030)-002. The compliance plan and letter from the County Health Department are included as Attachments D and E. The facility has until October 1, 2013, to develop a low solvent ink that will work for their customers or they will be required to apply for a variance to the rule.

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

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

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

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

Prepared by:

Jill Wade, P.E.
Environmental Engineer

Mr. Robert Freund
F & S Printing
10430 Midwest Industrial Blvd.
Olivette, MO 63132

Re: F & S Printing, 189-1520
Permit Number: **OP2013-039**

Dear Mr. Freund:

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 Jill Wade 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/jwk

Enclosures

c: Mr. Mike Zlatic, St. Louis County Department of Health
St. Louis Regional Office
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