



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: OP2012-005
Expiration Date: JAN 22 2017
Installation ID: 510-1055
Project Number: 2007-05-047

Installation Name and Address

Goodwin Brothers Printing Company
2613 North Broadway
St. Louis, MO 63102
St. Louis City

Parent Company's Name and Address

Goodwin Brothers Printing Company
2613 North Broadway
St. Louis, MO 63104

Installation Description:

Goodwin Brothers is a St. Louis based commercial printing company specializing in the production of newspaper inserts and direct mail pieces.

JAN 23 2012

Effective Date



Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
DOCUMENTS INCORPORATED BY REFERENCE	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
PERMIT CONDITION PW001	5
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	5
PERMIT CONDITION PW002	6
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	6
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	7
PRINTING PRESS AND DRYER OPERATIONS (CATALYTIC OXIDIZER GROUP).....	7
CD-1 Permit Condition	7
10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations – Heatset Web Press Emission Control Systems	7
OF3921B-1, OF3921B-2, OF3921B-3 and OF3921B-4 Group Permit Condition	8
10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations – Heatset Web Press Emission Control Systems	8
6023, 6024, 6025 and 6026 Group Permit Condition 1.....	9
10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations – Fountain Solution	9
6023, 6024, 6025 and 6026 Group Permit Condition 2.....	9
10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations – Press Cleaning	9
VISIBLE EMISSION SOURCES	10
Visible Emission Sources Permit Condition	10
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants St. Louis City Ordinance 68657, Section Fifteen, Restriction of Visible Air Emissions	10
ENDNOTES:	11
10 CSR 10-5.442 Control of Emissions from Lithographic and Letterpress Printing Operations.....	11
IV. CORE PERMIT REQUIREMENTS	20
V. GENERAL PERMIT REQUIREMENTS.....	29
VI. ATTACHMENTS	33
ATTACHMENT A	34
Fugitive Emission Observations	34
ATTACHMENT B	35
Opacity Emission Observations	35
ATTACHMENT C	36
Method 9 Opacity Emissions Observations	36
ATTACHMENT D	37
Inspection/Maintenance/Repair/Malfunction Log	37
ATTACHMENT E	38
Sample 12-Month Period VOC Compliance Work Sheet	38
ATTACHMENT F.....	39
Sample 12-Month Period HAP Compliance Work Sheet	39
ATTACHMENT G	40
Sample Temperature Chart Recording.....	40

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Goodwin Brothers is a St. Louis based commercial printing company specializing in the production of newspaper inserts and direct mail pieces. They have over 100 years of knowledge, experience, and dependability in providing print buyers with quality professional services.

Goodwin Brothers Printing Company was established in 1906 by brothers, James, Emmett and Asa Goodwin. They commenced business in a very small way at 2520 North Broadway in downtown St. Louis. The firm did a general line of commercial printing.

The enterprise grew and its trade area gradually expanded, the establishment incorporating under the laws of the State of Missouri in 1914. The company survived the Depression years printing calendars, laundry lists, and even advertisements for the government promoting the sale of war bonds.

Goodwin Brothers has continued to grow since then, increasing in size over the years and now encompassing over 40,000 square foot of building space. Today, they specialize in retail inserts but have the flexibility to handle many other printing projects.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM ₁₀)	-- ¹	--	--	--	--
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	--	--	--	--	--
Sulfur Oxides (SO _x)	--	--	--	--	--
Nitrogen Oxides (NO _x)	--	--	--	--	--
Volatile Organic Compounds(VOC)	8.5	8.5	8.9	11.3	11.1
Carbon Monoxide (CO)	--	--	--	--	--
Lead (Pb)	--	--	--	--	--
Hazardous Air Pollutants (HAPs)	--	--	--	--	--
Ammonia (NH ₃)	--	--	--	--	--

¹ Values so marked are below the reporting threshold.

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.

Emission Unit	Emission Unit Description	Equipment Number
CD-1	Catalytic Oxidizer	
6023	Lithographic Web Press, constructed 1986.	
6024	Lithographic Web Press, constructed 1986.	
6025	Lithographic Web Press, constructed 1986.	
6026	Lithographic Web Press, constructed 1986.	
OF3921B-1	Dryer	
OF3921B-2	Dryer	
OF3921B-3	Dryer	
OF3921B-4	Dryer	
EP-1	Catalytic oxidizer and heat exchanger exhaust stack	
ERPID-2		

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.

Emission Unit	Emission Unit Description	Equipment Number
	no sources identified	

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

None

II. Plant Wide Emission Limitations

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

The following requirements apply to all conditions in addition to any other requirements listed in the specific conditions, unless otherwise noted in the specific conditions.

Monitoring:

The permittee shall calibrate, maintain and operate all instruments and control equipment according to the manufacturer's recommendations or according to good engineering practices.

Recordkeeping:

The permittee shall record all required recordkeeping (i.e. inspections and corrective actions) in the appropriate format. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations. Results of any testing conducted on an emission unit.

Reporting²:

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance any of the terms imposed by this permit, no later than ten (10) days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition), to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102
- 2) The permittee shall submit an annual certification³ 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. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

Permit Condition PW001

10 CSR 10-6.065(2)(C) and
10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period⁴.

² Refer to Section V. General Permit Requirements, 10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements, page 29, for additional details, including semi-annual reporting of monitoring data.

³ Refer to Section V. General Permit Requirements, 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, page 31, for more details.

⁴ The total of 12 monthly totals ending with the month of interest; or, when there are less than 12 monthly totals available, the total of the monthly totals available divided by 12. A new limit or change of limit initiates a new period.

Recordkeeping:

The permittee shall use Attachment E, or its equivalent, to demonstrate compliance with this condition.

Permit Condition PW002

10 CSR 10-6.065(2)(C) and
10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

1. The permittee shall emit less than ten (10) tons in any consecutive 12-month period of any single hazardous air pollutant (HAP) from the entire installation.
2. The permittee shall emit less than twenty-five (25) tons in any consecutive 12-month period of all HAPs combined from the entire installation.

Recordkeeping:

The permittee shall use Attachment F (two tables), or their equivalent, to demonstrate compliance with this condition. The records in Attachment F are only necessary when any HAPs are emitted. The permittee shall maintain records of the Material Safety Data Sheets (MSDS) for all materials used at the installation for which there are MSDS available.

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.

Printing Press and Dryer Operations (Catalytic Oxidizer Group)		
Emission Unit	Description	Manufacturer / Model #
CD-1	Catalytic Oxidizer	
6023	Lithographic Web Press, constructed 1986.	Goss Graphics International, C-150/#6023-#6026
6024	Lithographic Web Press, constructed 1986.	Goss Graphics International, C-150/#6023-#6026
6025	Lithographic Web Press, constructed 1986.	Goss Graphics International, C-150/#6023-#6026
6026	Lithographic Web Press, constructed 1986.	Goss Graphics International, C-150/#6023-#6026
OF3921B-1	Dryer	
OF3921B-2	Dryer	
OF3921B-3	Dryer	
OF3921B-4	Dryer	

<p>CD-1 Permit Condition</p> <p>10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations – Heatset Web Press Emission Control Systems</p>
--

Emission / Operational Limitations:

The permittee shall insure the following:

- 1) The catalytic oxidizer shall be in use at all times that regulated volatile organic compounds (VOC) emissions are possible from the print presses except during start-up, shut down, and malfunction.
- 2) All presses have a dryer which has one hundred percent (100%) of its exhaust ducted to a control device that is maintained and operated to achieve ninety percent (90%) by weight control efficiency.
- 3) The permittee shall operate the oxidizer at or above the following temperature set points⁵:
 - a. Oxidizer Burner Inlet Temperature: 550 degrees Fahrenheit;
 - b. Oxidizer Reactor Inlet Temperature: 650 degrees Fahrenheit;
 - c. Oxidizer Reactor Outlet Temperature: 500 degrees Fahrenheit.
- 4) The permittee shall conduct testing on the oxidizer within the first three (3) years of the term of this permit using the methodologies set forth in Subsection (5)(A) of 10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations. The permittee will submit any modifications to this permit necessary to insure compliance as a result of the testing.

⁵ These temperatures are recommended by manufacturer. Once testing is completed, new temperature set points may or may not result.

Monitoring:

- 1) The permittee shall install, calibrate, maintain, and operate at all times continuous temperature monitors while the web presses and the corresponding dryers are operating.
- 2) Temperatures shall be measured with an accuracy of plus or minus seventy-five hundredths of one percent ($\pm 0.75\%$) measured in degrees Celsius, or two and one-half degrees Celsius ($2.5\text{ }^{\circ}\text{C}$).
- 3) The operating temperatures to be used as the parameters for demonstrating continuous compliance shall be determined per Subsection (5)(A) of 10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations. The monitors continuously shall measure the oxidizer's burner inlet, catalyst reactor inlet and catalyst reactor outlet temperatures.
- 4) The oxidizer shall be inspected periodically to verify proper function when the associated equipment is in operation.

Recordkeeping:

- 1) The permittee shall record the oxidizer's burner inlet, catalyst reactor inlet and catalyst reactor outlet temperatures at least every 15 minutes. Samples of the recordkeeping format are provided in Attachment G.
- 2) The permittee shall maintain records sufficient to determine continuous compliance for the oxidizer to demonstrate that the control efficiency is being maintained. The permittee shall maintain operating and maintenance records for the oxidizer using Attachment D (or its equivalent) which records the following:
 - a. Any time that the oxidizer alarms are triggered, and the response or actions taken as a result of the alarm;
 - b. Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - c. Maintenance activities, with inspection schedule, repair actions, and replacements or additions of components.

OF3921B-1, OF3921B-2, OF3921B-3 and OF3921B-4 Group Permit Condition

10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations – Heatset Web Press Emission Control Systems

Emission / Operational Limitations:

The permittee shall insure the following:

- 1) The exhaust streams from the dryers shall be vented to the catalytic oxidizer at all times except during start-up, shut down, and malfunction.
- 2) All presses have a dryer which has one hundred percent (100%) of its exhaust ducted to a control device that is maintained and operated to achieve ninety percent (90%) by weight control efficiency.
- 3) The dryer pressure shall be maintained below the pressure of the press room at all times while the press is operating.

Monitoring:

No monitoring of the dryer air flow is required.

Recordkeeping:

The permittee shall maintain operating and maintenance records for fans supporting the dryer exhaust using Attachment D (or its equivalent) which records the following:

- 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and

- 2) Maintenance activities, with inspection schedule, repair actions, and replacements or additions of components.

6023, 6024, 6025 and 6026 Group Permit Condition 1

10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations – Fountain Solution

Emission / Operational Limitations:

The permittee shall not use nor permit the use of any affected offset lithographic printing press unless—

- 1) The fountain solution, as applied, contains one and six-tenths percent (1.6%) or less by weight of alcohol; or
- 2) The fountain solution, as applied, contains three percent (3.0%) or less by weight of alcohol and is refrigerated to a temperature of sixty degrees Fahrenheit (60°F) or less; or
- 3) The fountain solution, as applied, contains five percent (5.0%) or less by weight of alcohol substitutes; and
- 4) The fountain solution mixing tanks are covered for alcohol-based solutions;

Recordkeeping:

The permittee shall maintain records to show:

- 1) For each fountain solution whose VOC content is modified, the calculation or direct measurement data that indicates the resultant VOC content by weight. The calculation or measurement need only be performed once for each batch of fountain solution used except that it need not be performed at all for the dilution of a fountain solution containing alcohol substitutes purchased with less than five percent (5.0%) VOC content before dilution or for alcohol containing fountain solutions requiring refrigeration purchased with less than three percent (3%) VOC content.
- 2) For each fountain solution, a manufacturer's formulation data sheet or Material Safety Data Sheet (MSDS) listing the physical properties of alcohol or alcohol substitute(s) such as density and percent VOC as purchased from the supplier;
- 3) The fountain solution refrigeration temperature at least once per day or once per batch, whichever is longer.

6023, 6024, 6025 and 6026 Group Permit Condition 2

10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations – Press Cleaning

Emission / Operational Limitations:

The permittee shall not use nor permit the use of any applicable offset lithographic or letterpress printing press unless—

- 1) All cleaning solutions, excluding a quantity not to exceed one hundred ten (110) gallons per facility in any twelve (12) consecutive months, shall have a VOC content of seventy percent (70%) or less, by weight, or a composite partial vapor pressure less than or equal to ten (10) millimeters of mercury (Hg) at twenty degrees Celsius (20 °C);
- 2) The cleaning solutions are kept in tightly-covered containers at all times except when being dispensed as needed for cleaning operations;
- 3) The used cleaning cloths contaminated with cleaning solutions are placed in tightly closed containers while awaiting off-site transportation. The cleaning cloths should be properly cleaned and disposed; and

- 4) The VOC content or composite partial vapor pressure of the cleaning solution, as applied, shall be established with proper recordkeeping which may include, as necessary to determine compliance, the amount of concentrated cleaning solution added per quantity of water, date of preparation, calculated VOC content, composite partial vapor pressure of the final solution, by measurement using EPA Method 24 analysis as outlined in Paragraph (5)(C)2. of 10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations, or the formula in Paragraph (5)(C)3. of 10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations. For automatic blanket wash systems, verification and recordkeeping of the mixer settings shall be performed at least once each month.

Recordkeeping:

The permittee shall maintain records to show:

- 1) A Material Safety Data Sheet or manufacturer’s formulations data listing the percentage by weight of VOC in the cleaning solution, the composite partial vapor pressure of VOC in the cleaning solution, or the necessary data to make a determination thereof as outlined in Subsection (5)(C) of 10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations;
- 2) For each cleaning solution whose VOC content is modified, the calculation that indicates the resultant VOC content by weight or composite partial vapor pressure. The calculation need only be performed once for each batch of cleaning solution used except that it need not be performed at all for the dilution of a cleaning solution which does not exceed the VOC limits of Paragraph (3)(B)1. of 10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations; and
- 3) The quantity of all cleaning solution used which does not meet the VOC limits set forth in Paragraph (3)(B)1. of 10 CSR 10-5.442 Control of Emissions From Lithographic and Letterpress Printing Operations on a twelve (12) consecutive month basis.

Visible Emission Sources		
Emission Unit	Stack ID	Description
<i>EPI</i>	ERPID-2	Catalytic oxidizer and heat exchanger exhaust stack, extends 25 feet above the roof top

Visible Emission Sources Permit Condition 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants St. Louis City Ordinance 68657, Section Fifteen, Restriction of Visible Air Emissions
--

Emission Limitations:

The permittee shall not discharge into the ambient air from any source, not exempted under 10 CSR 10-6.220, any air contaminant of opacity greater than twenty (20%) percent. A source with a 20 percent opacity limit may emit air contaminants with opacity over 20 percent, but not greater than 40 percent for an aggregate length of time not to exceed six (6) minutes in any 60 minutes. Where the presence of uncombined water is the only reason for failure of an emission to meet the opacity requirements, the opacity requirements shall not apply.

Monitoring / Recordkeeping:

The permittee will follow the monitoring and recordkeeping requirements listed in Section IV. Core Permit Requirements for 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants, starting on page 25.

Endnotes:

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

PURPOSE: This rule restricts volatile organic compound emissions from lithographic and letterpress printing operations.

(1) Applicability.

- (A) This rule shall apply to installations that operate offset lithographic or letterpress printing presses including heatset web, non-heatset web (newspaper and non-newspaper), and non-heatset sheet-fed presses in the City of St. Louis and Jefferson, St. Charles, Franklin, and St. Louis Counties.
- (B) This rule shall apply only to installations described in Subsection (1)(A) of this rule, with total actual emissions from lithographic and letterpress printing operations, including related cleaning activities, before consideration of controls, of more than three (3) tons per twelve (12)-month rolling period of volatile organic compounds (VOCs).
- (C) This rule shall not apply to printing on fabric, metal, or plastic.
- (D) Once the installation exceeds the applicability level of this rule, it shall remain subject to this rule even if its actual emissions drop below the applicability level of this rule until it can demonstrate, to the satisfaction of the Director, that the total actual VOC emissions from lithographic and letterpress printing operations including related cleaning activities, before consideration of controls, is less than three (3) tons per twelve (12)-month rolling period for sixty (60) consecutive months.
- (E) VOC emissions calculations guidance may be found in Subsection (5)(D) of this rule. As an alternative, the material use guidance in Subsection (5)(E) of this rule may be used to determine applicability.

(2) Definitions. Definitions of certain terms specified in this rule may be found in 10 CSR 10-6.020.

(3) General Provisions.

- (A) Fountain Solutions. This subsection applies only to offset lithographic presses⁶ with a total fountain solution reservoir capacity of one (1) gallon or more.
 - 1. No owner or operator shall use or permit the use of any applicable offset lithographic printing press unless—
 - A. For each heatset web press—
 - (I) The fountain solution, as applied, contains one and six-tenths percent (1.6%) or less by weight of alcohol; or
 - (II) The fountain solution, as applied, contains three percent (3.0%) or less by weight of alcohol and is refrigerated to a temperature of sixty degrees Fahrenheit (60°F), or less; or
 - (III) The fountain solution, as applied, contains five percent (5.0%) or less by weight of alcohol substitutes; and
 - (IV) The fountain solution mixing tanks are covered for alcohol-based solutions;

⁶ The permittee does not have lithographic presses, therefore this portion (“grayed”) does not apply to the permittee. Other non-applicable portions of the rule have been grayed out also.

- B. For each sheet-fed press with a maximum sheet size greater than 11x17 inches—
 - (I) The fountain solution, as applied, contains five percent (5.0%) or less by weight of alcohol; or
 - (II) The fountain solution, as applied, contains eight and five-tenths percent (8.5%) or less by volume of alcohol and is refrigerated to a temperature of sixty degrees Fahrenheit (60°F), or less; or
 - (III) The fountain solution, as applied, contains five percent (5.0%) or less by weight of alcohol substitutes or a combination of alcohol and alcohol substitutes; and
 - (IV) The fountain solution mixing tanks containing alcohol-based solutions are covered;
 - C. For each non-heatset web press, the fountain solution, as applied, contains no alcohol and five percent (5.0%) or less by of alcohol substitutes;
 - 2. Direct measurement of the alcohol content of the fountain solution, as applied, shall be performed and recorded with a hydrometer, equipped with temperature correction or with readings adjusted for temperature, at least once per day or once per batch, whichever is longer. A standard solution shall be used to calibrate the hydrometer once per month for the type of alcohol used in the fountain;
 - 3. For fountain solutions, as applied, containing alcohol substitutes or nonalcohol additives and, as an alternative to Paragraph (3)(A)2. of this rule, the VOC content shall be established with proper recordkeeping which may include, as necessary to determine compliance, the amount of concentrated substitute added per quantity of fountain water, date of preparation, calculated VOC content of the final solution, or by measurement using U.S. Environmental Protection Agency (EPA) Method 24 analysis as outlined in Paragraph (5)(C)1. of this rule. For automatic mixing systems, verification and recordkeeping of the mixer settings shall be performed at least once each month; and
 - 4. The fountain solution temperature for each required refrigerated fountain reservoir containing alcohol based solutions shall be measured at least once per day or once per batch, whichever is longer, by a thermometer or other temperature detection device capable of reading to one-half degree Fahrenheit (0.5°F).
- (B) Press Cleaning. No owner or operator shall use or permit the use of any applicable offset lithographic or letterpress printing press unless—
- 1. All cleaning solutions, excluding a quantity not to exceed one hundred ten (110) gallons per facility in any twelve (12) consecutive months, shall have a VOC content of seventy percent (70%) or less, by weight, or a composite partial vapor pressure less than or equal to ten (10) millimeters of Mercury (Hg) at twenty degrees Celsius (20°C);
 - 2. The cleaning solutions are kept in tightly covered containers at all times except when being dispensed as needed for cleaning operations;
 - 3. The used cleaning cloths contaminated with cleaning solutions are placed in tightly closed containers while awaiting off-site transportation. The cleaning cloths should be properly cleaned and disposed; and
 - 4. The VOC content or composite partial vapor pressure of a the cleaning solution as applied, shall be established with proper recordkeeping which may include, as necessary to determine compliance, the amount of concentrated cleaning solution

added per quantity of water, date of preparation, calculated VOC content, composite partial vapor pressure of the final solution, by measurement using EPA Method 24 analysis as outlined in Paragraph (5)(C)2. of this rule, or the formula in Paragraph (5)(C)3. of this rule. For automatic blanket wash systems, verification and recordkeeping of the mixer settings shall be performed at least once each month.

(C) Heatset Web Press Emission Control Systems. This subsection applies only to heatset web lithographic and letterpress printing presses with the potential to emit (PTE) VOCs from ink oil greater than twenty-five tons per year (25 tpy) unless any such press is used for book printing or has a maximum web width of twenty-two (22) inches or less.

1. No owner or operator shall use or permit the use of any press without a dryer which has one hundred percent (100 %) of its exhaust ducted to a control device that is maintained and operated to achieve, at all times while the press is operating, at least the indicated percentage by weight control efficiency.

VOC Control Device First Installed	VOC Control Percentage
Prior to March 1, 2012	90
On or after March 1, 2012	95

The dryer pressure shall be maintained below the pressure of the press room at all times while the press is operating. Continuous dryer air flow monitoring is not required.

2. As an alternative to achieving the applicable control efficiency in Paragraph (3)(C)1. of this rule, any press shall operate its control device to maintain a maximum VOC outlet concentration of twenty parts per million by volume (20 ppmv) as Hexane (C₆H₁₄) on a dry basis.

(D) Use of emission control equipment under Subsection (3)(C) of this rule shall require that continuous temperature monitors be installed, calibrated, maintained, and operated at all times while a connected printing press is operating. Temperatures shall be measured with an accuracy of plus or minus seventy-five hundredths of one percent ($\pm 0.75\%$) measured in degrees Celsius, or two and one-half degrees Celsius (2.5°C). The operating temperatures to be used as the parameters for demonstrating continuous compliance shall be determined per Subsection (5)(A) of this rule. The monitors continuously shall measure—

1. For catalytic oxidizers, the gas temperature upstream of the catalyst bed;
2. For thermal and regenerative oxidizers, the oxidizer operating temperature; and
3. Any other parameters considered necessary by the Director to verify compliance and proper operation of emission control equipment.

(4) Reporting and Recordkeeping.

(A) All persons subject to this rule shall maintain records as required by this section sufficient to determine continuous compliance with this rule. These records shall be kept for at least five (5) years or longer if enforcement action is pending. These records shall be available immediately upon request for review by the Department of Natural Resources' personnel and other air pollution control agencies upon presentation of proper credentials.

-
- (B) All persons subject to Subsection (3)(C) of this rule shall maintain records for each control device sufficient to demonstrate that the control efficiency is being maintained. These records shall include, but are not limited to:
1. The temperature readings, logged at least once every fifteen (15) minutes, from the monitors required by Paragraphs (3)(D)1. and (3)(D)2. of this rule; and
 2. The operating parameters of any required control device determined from any initial or subsequent control efficiency compliance testing as outlined in Subsection (5)(A) of this rule.
- (C) For each applicable printing press, records shall be maintained to show—
1. For each fountain solution whose VOC content is modified, the calculation or direct measurement data that indicates the resultant VOC content by weight. The calculation or measurement need only be performed once for each batch of fountain solution used except that it need not be performed at all for the dilution of a fountain solution containing alcohol substitutes purchased with less than five percent (5.0%) VOC content before dilution or for alcohol containing fountain solutions requiring refrigeration purchased with less than three percent (3%) or eight and five tenths percent (8.5%) VOC content, for heatset web and sheet-fed presses, respectively;
 2. For each fountain solution, a manufacturer's formulation data sheet or Material Safety Data Sheet (MSDS) listing the physical properties of alcohol or alcohol substitute(s) such as density and percent VOC as purchased from the supplier;
 3. Results of any testing conducted on an emission unit at a regulated facility;
 4. Maintenance records and inspection results of any air pollution control equipment; and
 5. The temperature, as required by Paragraph (3)(A)1. of this rule, at least once per day or once per batch, whichever is longer.
- (D) For each lithographic and letterpress printing installation subject to this rule, records shall be maintained to show—
1. A Material Safety Data Sheet or manufacturer's formulations data listing the percentage by weight of VOC in the cleaning solution, the composite partial vapor pressure of VOC in the cleaning solution, or the necessary data to make a determination thereof as outlined in Subsection (5)(C) of this rule;
 2. For each cleaning solution whose VOC content is modified, the calculation that indicates the resultant VOC content by weight or composite partial vapor pressure. The calculation need only be performed once for each batch of cleaning solution used except that it need not be performed at all for the dilution of a cleaning solution which does not exceed the VOC limits of Paragraph (3)(B)1. of this rule; and
 3. The quantity of all cleaning solution used which does not meet the VOC limits set forth in Paragraph (3)(B)1. of this rule on a twelve (12) consecutive month basis.
- (E) The Director may require other records as reasonable and necessary to carry out the provisions of the Missouri Air Conservation Law.
- (5) Test Methods. Certain test methods mentioned in this rule may be found in 10 CSR 10-6.030. Other EPA test methods specific to this rule may be found in 40 CFR 60, Appendix A.
- (A) Control Efficiency Testing. To demonstrate compliance with the emission limits of Subsection (3)(C) of this rule, an initial emission test shall be performed after any required control equipment is installed. The emission limits shall not have been met until

compliance has been verified through this testing. Testing shall also be required after significant modifications to any control equipment required by this rule. Significant modifications include any repairs or changes that might substantially alter or affect the overall control efficiency. This subsection outlines the methods to be used for any such testing.

1. The emission unit shall be run at typical operating conditions and flow rates compatible with scheduled production during any emission testing.
2. Capture efficiency testing for heatset dryers is not required if it is demonstrated that pressure in the dryer is negative relative to the surrounding press room and the airflow is into the dryer. This test may be performed with a differential pressure gauge or an airflow direction indicator (e.g. smoke stick or aluminum ribbons).
3. EPA Method 1 or 1A, as appropriate, shall be used to select the sampling sites.
4. EPA Method 2, 2A, 2C, or 2D, as appropriate, shall be used to determine the velocity and volumetric flow rate of the exhaust stream.
5. EPA Method 3 or 3A, as appropriate, shall be used to determine the concentration of Oxygen (O₂) and Carbon Dioxide (CO₂).
6. EPA Method 4 shall be used to determine moisture content.
7. EPA Method 18, 25, or 25A shall be used to determine the VOC concentration of the exhaust stream entering and exiting the control device, unless the alternate limit in Paragraph (3)(C)2. of this rule is being used for compliance, in which case only the VOC concentration of the exit exhaust shall be determined. In cases where the anticipated outlet VOC concentration of the control device is less than fifty (50) ppmv as carbon, EPA Method 25A shall be used.
8. If EPA Method 25A is used—
 - A. The outlet readings from a thermal or catalytic oxidizer may be corrected by using EPA Method 18 or 25 to determine non-VOC components (methane and ethane) and subtracting these from the Method 25A result; and
 - B. The Director may require a retest by EPA Method 18 or 25 if the average corrected outlet reading is greater than fifty (50) ppmv VOC as carbon.
9. A compliance test shall consist of up to three (3) separate runs, each lasting a minimum of sixty (60) minutes unless the Director determines that the circumstances dictate shorter sampling times.
10. EPA Method 25 specifies a minimum probe temperature of two hundred sixty five degrees Fahrenheit (265°F). To prevent condensation, the probe should be heated to at least the gas stream temperature, typically close to three hundred fifty degrees Fahrenheit (350°F).
11. EPA Method 25A specifies a minimum temperature of two hundred twenty degrees Fahrenheit (220°F) for the sampling components leading to the analyzer. To prevent condensation when testing heatset printing presses, the sampling components and flame ionization detector lock should be heated to at least the gas stream temperature, typically close to three hundred fifty degrees Fahrenheit (350°F).
12. The oxidizer operating temperature or the temperature of the gas upstream of the catalyst bed may be used as the operating parameter for determining continuous compliance with the emission standard of Subsection (3)(C) of this rule. This

temperature shall be computed as the time-weighted average of the temperature values recorded during the test. The owner or operator must maintain the oxidizer at a three (3)-hour average temperature equal to or greater than a temperature fifty degrees Fahrenheit (50°F) below the average temperature observed during the most recent stack test to demonstrate continuous compliance.

13. Use of an adaptation to any of the methods specified in this subsection may be approved by the Director on a case-by-case basis. The owner or operator shall submit sufficient documentation for the Director to find that the methods specified in this subsection will yield inaccurate results and that the proposed adaptation is appropriate.
- (B) Control Device Inspection. For catalytic oxidizers, the catalyst bed material shall be inspected annually for general catalyst condition and any signs of potential catalyst depletion. The owner or operator shall also collect a representative sample of the catalyst from the oxidizer, per manufacturer's recommendations, and have it tested to evaluate the catalyst's capability to continue to function at or above the required control efficiency. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations, but not less than once per year.
- (C) VOC Content Testing.
1. Fountain solutions. Compliance with the VOC content limits for fountain solutions established in Subsection (3)(A) of this rule shall be determined by one (1) of the following:
 - A. If fountain solution is diluted prior to use, a calculation that combines EPA Method 24 analytical data for the concentrated materials used to prepare the fountain solution and the proportions in which they are mixed to make the as-applied material. The analysis of the concentrated materials may be performed by the supplier of those materials. Owners or operators may use formulation information provided with the concentrated materials used to prepare the fountain solution, such as the container label, the product data sheet, or the MSDS sheet to document the VOC content of the concentrated material;
 - B. If fountain solution is not diluted prior to use, MSDS or manufacturer's formulation data sheet may be used; or
 - C. EPA Method 24 of a sample of fountain solution, as applied.
 2. Cleaning solutions. The VOC content or VOC composite partial vapor pressure of cleaning solutions shall be determined by one (1) of the following:
 - A. Analysis by EPA Method 24 for VOC content or by an appropriate method for VOC composite partial vapor pressure of a sample of the cleaning solution. See formula in Paragraph (5)(C)3. of this rule. The analysis may be performed by the supplier of those materials; or
 - B. Calculation for VOC content that combines EPA Method 24 analytical data for the concentrated materials used to prepare the cleaning solution and the proportions in which they are mixed to make the cleaning solution as applied. Owners or operators may use formulation information provided with the concentrated materials used to prepare the cleaning solution, such as the container label, the product data sheet, or the MSDS sheet to document the VOC content of the concentrated material;

- C. If cleaning solution is not diluted prior to use, MSDS or manufacturer's formulation data sheet may be used.
3. Calculations. The VOC composite partial vapor pressure is the sum of the partial pressure of the compounds defined as VOCs. VOC composite partial vapor pressure is calculated as follows:

$$PP_c = \sum_{i=1}^n \frac{(W_i)(VP_i) / MW_i}{\frac{W_w}{MW_w} + \frac{W_c}{MW_c} + \sum_{i=1}^n \frac{W_i}{MW_i}}$$

Where:

- W_i = Weight of the i^{th} VOC compound, in grams;
 W_w = Weight of water, in grams;
 W_c = Weight of exempt compound, in grams;
 MW_i = Molecular weight of the i^{th} VOC compound, in g/g-mole;
 MW_w = Molecular weight of water, in g/g-mole;
 MW_c = Molecular weight of exempt compound, in g/g-mole;
 n = Number of VOC compounds;
 PP_c = VOC composite partial vapor pressure at 20°C (68°F), in mm Hg;
 VP_i = Vapor pressure of the i^{th} VOC compound at 20°C (68°F), in mm Hg.

- (D) VOC Emission Calculations, Retention Factors and Capture Efficiencies. For purposes of determining VOC emissions from lithographic and letterpress printing operations, the following retention factors and capture efficiencies and formula shall be used:
1. A portion of the VOC contained in inks and cleaning solution is retained in the printed web or in the shop towels used for cleaning. The following retention factors shall be used:
 - A. For heatset inks printed on absorptive substrates, a twenty percent (20%) VOC retention factor shall be used meaning eighty percent (80%) of the VOC in the ink is emitted during the printing process and is available for capture and control by an add-on pollution control device;
 - B. For sheet-fed and non-heatset web inks printed on absorptive substrates, a ninety-five percent (95%) VOC retention factor shall be used meaning five percent (5%) of the VOC in the ink is emitted during the printing process; and
 - C. For cleaning solution VOC emissions from shop towels using cleaning solutions with a VOC composite vapor pressure of no more than ten (10) mmHg at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68 F)), a fifty percent (50%) VOC retention factor shall be used if the contaminated shop towels are kept in closed containers.
 2. A portion of the VOC contained in inks, fountain solutions, and automatic blanket washes on heatset presses is captured in the press dryer for control by add-on pollution control devices. The following capture factors shall be used:
 - A. For inks, a one hundred percent (100%) VOC capture efficiency shall be used. All the VOC in the ink that is not retained is assumed to be volatilized in the press dryer if it is demonstrated that the pressure in the

- dryer is negative relative to the surrounding press room and the airflow is into the dryer;
- B. For fountain solutions containing alcohol substitutes, a seventy percent (70%) VOC capture factor shall be used; and
 - C. For automatic blanket wash solutions with a VOC composite partial vapor pressure of no more than ten (10) mmHg at twenty Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)), a forty percent (40%) VOC capture factor shall be used.
3. For calculating VOC emissions, the following equations shall be used:
- A. For total VOC emissions from an offset lithographic printing facility, including all related cleaning activities —

$$VOC_{TOT} = \sum_{i=1}^m W_{INK_i} * VOC_{INK_i} * \left(1 - \frac{RF_{INK_i}}{100}\right) + \sum_{i=1}^n VOL_{FS_i} * VOC_{FS_i} + \sum_{i=1}^p VOL_{CS_i} * VOC_{CS_i} * \left(1 - \frac{RF_{CS_i}}{100}\right)$$

Where:

- VOC_{TOT} = Total VOC emissions, expressed as pounds;
- W_{INK} = Weight of ink used, expressed as pounds;
- VOC_{INK} = Weight fraction of VOC in the ink;
- RF_{INK} = Retention factor of the ink, expressed as a percent.
- m = Number of inks;
- VOL_{FS} = Volume of fountain solution used, expressed as gallons;
- VOC_{FS} = VOC content of fountain solution, expressed as pounds per gallon;
- n = Number of fountain solutions;
- VOL_{CS} = Volume of cleaning solution used, expressed as gallons;
- VOC_{CS} = VOC content of cleaning solution, expressed as pounds per gallon;
- RF_{CS} = Retention factor of the cleaning solution, expressed as a percent;
- p = Number of cleaning solutions.

- B. For VOC ink oil emissions from a heatset web lithographic or letterpress printing press —

$$VOC_{TOT} = \sum_{i=1}^n W_{INK_i} * VOC_{INK_i} * \left(1 - \frac{RF_{INK_i}}{100}\right)$$

Where:

- VOC_{TOT} = Total VOC emissions, expressed as pounds;
- W_{INK} = Weight of ink used, expressed as pounds;
- VOC_{INK} = Weight fraction of VOC in the ink;
- RF_{INK} = Retention factor of the ink, expressed as a percent.
- n = Number of inks.

- (E) Material Use Guidance: Applicability Determination. Based on EPA's *Potential to Emit (PTE) Guidance for Specific Source Categories* (April 14, 1998) and the equations of Paragraph (5)(D)3. of this rule, the methods in this subsection may be used for determining if a facility or press meets the corresponding applicability thresholds.

1. For determining if a facility meets the applicability limits of Subsection (1)(B) of this rule, the material use thresholds are as follows:

Type of Printing Operation	12-Month Rolling Material Use Threshold
Sheet-fed	768 gallons of cleaning solvent and fountain solution additives
Non-heatset Web	768 gallons of cleaning solvent and fountain solution additives
Heatset Web	5,400 pounds of ink, cleaning solvent, and fountain solution additives

2. For determining if a web heatset press is subject to subsection (3)(C) of this rule, the material use thresholds are as follows:

Type of Printing Press	Annual Material Use Threshold
Heatset Web	55,800 pounds of ink

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) Goodwin Brothers Printing Company 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 Goodwin Brothers Printing Company 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 complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 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) Full paper EIQs shall be submitted to the Air Pollution Control Program by no later than April 1st after the end of the reporting year. Full electronic EIQs shall be submitted via MoEIS by no later than May 1st after the end of the reporting year.
- 6) Emission fees are due by no later than June 1st after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.
- 7) 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.
- 8) 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.

Monitoring:

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

The permittee shall maintain the following monitoring schedule⁷:

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

Recordkeeping:

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

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

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.

⁷ The reissuance of this operating permit will not affect the frequency of monitoring. The permittee may continue their current monitoring schedule for all affected emission units.

- 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.

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

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule⁸:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

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

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

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.

⁸ The reissuance of this operating permit will not affect the frequency of monitoring. The permittee may continue their current monitoring schedule for all affected emission units.

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's 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, 901 North 5th Street, Kansas City, KS 66101, 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 Joseph T. Goodwin, Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) 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 C

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

Attachment E

Sample 12-Month Period VOC Compliance Work Sheet

Twelve Month Rolling Monthly Totals

Month	Year	VOCs from Ink Usage	VOCs from Blanket Wash Usage	VOCs from Fountain Solution Usage	VOCs Generated	VOCs Emitted
September						
October						
November						
December						
January						
February						
March						
April						
May						
June						
July						
August						

Total Tons: ## ## ## ## Compliance Block

Notes: All values are in tons
 "VOCs Generated" column is the sum of "Ink Usage", "Blanket Wash Usage" and "Fountain Solution Usage" columns.
 "VOCs Emitted" column is "VOCs Generated" column reduced by control device efficiency, when exhaust stream is controlled. Permittee may use 100 % capture efficiency and 90% control efficiency until new values are established through testing.
 "Compliance Block" cell will contain the sum of 12 monthly VOC totals from the "VOCs Emitted" column. A value greater than 100 tons indicates a deviation from the plant-wide emission limitation.

Attachment F
 Sample 12-Month Period HAP Compliance Work Sheet

Month: _____	
Monthly HAP	HAP
Rolling 12-Month Total	
Sep-09	0.00
Aug-09	0.00
Jul-09	0.00
Jun-09	0.00
May-09	0.00
Apr-09	0.00
Mar-09	0.00
Feb-09	0.00
Jan-09	0.00
Dec-08	0.00
Nov-08	0.00
Oct-08	0.00
12-Month Total (lbs/yr)	0.00
12-Month Total (tons/yr)	0.00

Each Individual HAP

Month: _____	
Monthly HAPs	HAPs
Rolling 12-Month Total	
Sep-09	0.00
Aug-09	0.00
Jul-09	0.00
Jun-09	0.00
May-09	0.00
Apr-09	0.00
Mar-09	0.00
Feb-09	0.00
Jan-09	0.00
Dec-08	0.00
Nov-08	0.00
Oct-08	0.00
12-Month Total (lbs/yr)	0.00
12-Month Total (tons/yr)	0.00

Sum of all HAPs combined

Attachment G
Sample Temperature Chart Recording



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 May 9, 2007;
- 2) 2010 Emissions Inventory Questionnaire; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Project Listing

- 1) Completed October 1, 2001, Permit # OP96009, Expired December 6, 2001, Description: Printing-Intermediate, Permit Type: Local Issued OP, Project#: EX42801055010
- 2) Completed December 28, 2001, Description: Printing/Publishing, Permit Type: Intermediate Operating Permit, Project#: AP200110036, Status: Closed out, per policy
- 3) Completed May 10, 2007, Expired January 7, 2007, Description: Printing/Publishing, Permit Type: Intermediate Operating Permit, Project#: AP200201070, Status: Closed out, per policy
- 4) Completed August 1, 2005, Description: Remove limitation, Permit Type: Intermediate Operating Permit Amendment, Project#: AP200506039, Status: Closed out, per policy

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

None

Construction Permit 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

None

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Other Regulatory Determinations

None

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:

Randy E. Raymond
Environmental Engineer

CERTIFIED MAIL: 70093410000190189275
RETURN RECEIPT REQUESTED

Mr. Joseph T. Goodwin
Goodwin Brothers Printing Company
2613 North Broadway
St. Louis, MO 63102

Re: Goodwin Brothers Printing Company, 510-1055
Permit Number: **OP2012-005**

Dear Mr. Goodwin:

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 Randy Raymond at the Department's 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/mjsk

Enclosures

c: St. Louis Regional Office
PAMS File: 2007-05-047