

**STATE OF MISSOURI**



**DEPARTMENT OF NATURAL RESOURCES**

**MISSOURI AIR CONSERVATION COMMISSION**

**PERMIT TO CONSTRUCT**

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

Permit Number: **052007-010** Project Number: 2007-01-045

Parent Company: Henry Wurst, Inc.

Parent Company Address: P.O. Box 12598, North Kansas City, MO 64116

Installation Name: Henry Wurst, Inc.

Installation Address: 1331 Saline Street, North Kansas City, MO 64116

Location Information: Clay County, S50N, T24, R8.17

Application for Authority to Construct was made for:  
The installation of a new printing press. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

- 
- Standard Conditions (on reverse) are applicable to this permit.
  - Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

MAY 25 2007

EFFECTIVE DATE

  
\_\_\_\_\_  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

10-6.060

**STANDARD CONDITIONS:**

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

STATE OF MISSOURI



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EFFECTIVE DATE

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DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

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Permit No.	
Project No.	2007-01-045

**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were Included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

Henry Wurst, Inc.  
Clay County, S50N, T24, R8.17

1. Henry Wurst, Inc. shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. Henry Wurst, Inc. shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2007-01-045  
Installation ID Number: 047-0032  
Permit Number:

Henry Wurst, Inc.  
1331 Saline Street  
North Kansas City, MO 64116

Complete: 1/19/2007  
Reviewed: 4/10/2007

Parent Company:  
Henry Wurst, Inc.  
1331 Saline Street  
North Kansas City, MO 64116

Clay County, S50N, T24, R8.17

REVIEW SUMMARY

- Henry Wurst, Inc. has applied for authority to install a new printing press.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are toluene and glycol ethers.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment. Specifically subpart QQ does not apply.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment. Specifically subpart KK does not apply.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of volatile organic compounds (VOCs) and HAPs are below de minimis levels.
- This installation is located in Clay County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

- Emissions testing is not required for the equipment.
- An Intermediate Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

## INSTALLATION DESCRIPTION

Henry Wurst, Inc., located in North Kansas City, Missouri, is a printed products manufacturer operating both web and sheetfed equipment. The company is a minor source for VOCs and HAPs and holds an intermediate operating permit.

The following construction permits have been issued to Henry Wurst, Inc. from the Air Pollution Control Program.

Table 1: Construction Permits Issued

Permit Number	Description
0890-010	Waste paper shredders
1092-007	Eight unit press and regenerative thermal oxidizer
0697-019	2 sheetfed presses 28X40" 2 & 5 unit
0697-020	ASI 18 ft dryer to replace 10 ft dryer
112001-004	Move presses

## PROJECT DESCRIPTION

Henry Wurst, Inc.. has applied for authority to construct a new sheetfed printing press (EP-21). This press has a maximum hourly design rate of 15,000 impressions per hour. The press will replace two existing presses. No pollution control equipment is being used in association with the new press.

## EMISSIONS/CONTROLS EVALUATION

Emissions were calculated using a mass balance approach. Usage factors for pounds of material per impression were developed for ink, alcohol replacement, fountain solution and type wash. These usage factors were multiplied by the maximum hourly design rate for the new press to determine the maximum hourly usage rate for each material used in the new press. Henry Wurst, Inc.. submitted Material Safety Data Sheets for each material, and the materials with the highest VOC and HAP concentrations by weight were used to calculate potential emissions. For calculating potential emissions from this application, it was assumed that 100% of the VOCs and HAPs contained in the coatings were emitted as pollutants with the exception of the printing ink. According to a memorandum issued by the Director of the Air Pollution Control Program on April 27, 2005, 95% of the VOCs contained in non-heatset inks are assumed to be retained in the substrate with the remaining 5% emitted into the ambient

air. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	*Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM <sub>10</sub>	15.0	0.22	N/A	N/A	N/A
SOx	40.0	0.04	N/A	N/A	N/A
NOx	40.0	8.56	1.38	N/A	N/A
VOC	40.0	158.85	17.56	14.91	N/A
CO	100.0	1.45	N/A	N/A	N/A
Glycol Ethers	10.0	N/D	N/A	1.90	N/A
Toluene	10.0	N/D	N/A	0.89	N/A
Total HAPs	25.0	21.19	N/A	2.78	N/A

N/A = Not Applicable; N/D = Not Determined

\*Existing Potential Emissions were taken from permit #112001-004

### PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs and HAPs are below de minimis levels.

### APPLICABLE REQUIREMENTS

Henry Wurst, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110  
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065

- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-2.070
- *Control of Emissions From Lithographic Printing Installations*, 10 CSR 10-2.340

#### STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

\_\_\_\_\_  
 Michael Mittermeyer  
 Environmental Engineer

\_\_\_\_\_  
 Date

#### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 01/17/2007, received 01/19/2007, designating Henry Wurst, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Kansas City Regional Office Site Survey dated 02/01/2007.
- Memorandum issued on April 27, 2005 from Missouri Department of Natural Resources, Air Pollution Control Program, *Retention Factors for Non-Heatset and Heatset Web Offset Lithographic Printing Inks for Actual and Potential Emissions Calculations*.

Mr. Harry Hostetter  
Maintenance Manager  
Henry Wurst, Inc.  
1331 Saline Street  
North Kansas City, MO 64116

RE: New Source Review Permit - Project Number: 2007-01-045

Dear Mr. Hostetter:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and your amended operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Michael Mittermeyer at (573) 751-4817, or you may write to me at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH:mml

Enclosures

c: Kansas City Regional Office  
PAMS File: 2007-01-045  
Permit Number: