

## PART 70

# 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.

**Operating Permit Number:** OP2017-084  
**Expiration Date:** NOV 29 2022  
**Installation ID:** 115-0001  
**Project Number:** 2017-06-066

**Installation Name and Address**

Walsworth Publishing Company  
803 South Missouri Avenue  
Marceline, MO 64658  
Linn County

**Installation Description:**

Walsworth Publishing Company operates a yearbook printing installation. The paper pages go through lithographic printing presses before being cut, bound, and shipped. The installation is a major source of Volatile Organic Compounds (VOC). The installation is located in Linn County, an attainment area for all criteria pollutants

  
Prepared by  
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Operating Permit Unit

  
Director or Designee  
Department of Natural Resources

NOV 29 2017

Effective Date

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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-28	Diesel Emergency Generator, 315 HP, 2010

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-01	(4) Creo Platemakers and Film Cleaning
EP-04A	(1) Two Color Miller TP-38A Non-heatset Sheet-fed Offset Litho Printing Press
EP-04E	Five Color Komori Lithrone 40 L-540 Non-heatset Litho Printing Press, K-6
EP-04F	Eight Color Heidelberg SM-102-8P Non-heatset Offset Lithographic Printing Press, H-1
EP-04G	Eight Color Heidelberg SM-102-8P Non-heatset Offset Lithographic Printing Press, H-2
EP-04H	Eight Color Heidelberg XL106-8P5 Non-heatset Offset Lithographic Printing Press, H-3
EP-04I	Eight Color Heidelberg SM-102-8PS Non-heatset Offset Lithographic Printing Press, H-4
EP-04K	Eight Color Heidelberg XL106-8P5 Non-heatset Offset Lithographic Printing Press, H-6
EP-20	(20) Natural Gas Space Heaters, 0.966 MMBtu/hr total
EP-22	Natural Gas Fired Boiler, 0.4 MMBtu/hr
EP-25A	Sakurai SC 102 UV Cylinder Press w/assoc. Screen Making Equipment
EP-26A	HP-Indigo 7800 Digital Press
EP-26B	HP-Indigo 10000 Digital Press
EP-26C	Fuji Film J Press 720S
EP-26D	HP-Indigo 7900 Digital Press
EP-27A	Baker Perkins G-14 Lithographic Web Press
EP-27B	Natural Gas Dryer, 5.567 MMBtu/hr
EP-29	(3) Natural Gas Water Heaters, 165 Btu/hr each
EP-30	(2) Parts Washers
NA	400 Gallon Diesel Storage Tank

## 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 as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Specific Limitations.

<p><b>PERMIT CONDITION PW001</b>          10 CSR 10-6.060 Construction Permits Required          Construction Permit 122015-012, Issued December 22, 2015</p>
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**Emission Limitation:**

Special Condition 2A: The permittee shall emit less than 250.0 tons of VOCs in any consecutive 12-month period from the entire installation as detailed in Table 1.

**Table 1: VOC Emissions Sources at the Entire Installation**

Emission Unit	Description
EP-01	(4) Creo Platemakers and Film Cleaning
EP-04A	Two Color Miller TP-38A Non-heatset Sheet-fed Offset Lithographic Printing Press
EP-04E	Five Color Komori Lithrone 40 L-540 Non-heatset Lithographic Printing Press, K-6
EP-04F	Eight Color Heidelberg SM-102-8P Non-heatset Offset Lithographic Printing Press, H-1
EP-04G	Eight Color Heidelberg SM-102-8P Non-heatset Offset Lithographic Printing Press, H-2
EP-04H	Eight Color Heidelberg XL106-8P5 Non-heatset Offset Lithographic Printing Press, H-3
EP-04I	Eight Color Heidelberg SM-102-8PS Non-heatset Offset Lithographic Printing Press, H-4
EP-04K	Eight Color Heidelberg XL106-8P5 Non-heatset Offset Lithographic Printing Press, H-6
EP-20	(20) Natural Gas Space Heaters, 0.966 MMBtu/hr total
EP-22	Natural Gas Fired Boiler, 0.4 MMBtu/hr
EP-25A	Sakurai SC 102 UV Screen Press with associated screen making equipment
EP-26A	HP-Indigo 7800 Digital Press
EP-26B	HP-Indigo 10000 Digital Press
EP-26C	Fuji Film J Press 720S
EP-26D	HP-Indigo 7900 Digital Press
EP-27A	Baker Perkins G-14 Lithographic Web Press
EP-27B	Natural Gas Dryer, 5.567 MMBtu/hr
EP-28	Diesel Emergency Generator, 315 HP
EP-29	(3) Natural Gas Hot Water Heaters, 165 Btu/hr each
EP-30	(2) Parts Washers

**Operational Limitation:**

- 1) Special Condition 3A: The permittee shall keep all VOC containing chemicals, ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all VOC containing chemical containers used with this equipment.
- 2) The permittee shall place all cleaning cloths/rags that are used with VOC containing chemicals in sealed containers when not in use and while awaiting off-site transport.

**Monitoring/Recordkeeping:**

- 1) Special Condition 2B: The permittee shall calculate the monthly and rolling 12 month totals of VOC emissions using Attachment A or an equivalent form approved by Missouri Department of Natural Resources' personnel. Forms may be kept in paper or electronic format.
- 2) The permittee shall retain each record required by this permit for not less than five years and shall make them immediately available to any Missouri Department of Natural Resources' personnel upon request. These records shall include up-to-date Safety Data Sheets (SDS) for each material used.

**Reporting:**

- 1) Special Condition 4B: The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of the VOC emission limitation.
- 2) The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

### 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 as of the date that this permit is issued.

<b>PERMIT CONDITION 001</b>	
10 CSR 10-6.070 New Source Performance Regulations	
40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	
Emission Unit	Description
EP-28	Diesel Emergency Generator, 315 HP, 2010

**Emission Standards:**

- 1) The emergency engine shall be certified to the emission standards for new non-road compression ignition engines for the same model year and maximum engine power in §89.112 and §89.113 for all pollutants. [§60.4202(a)(2) and §60.4205(b)]
- 2) The permittee shall meet the requirements of 40 CFR Part 89, as applicable. [§60.4211(a)(3)]

**Operational Limitations:**

- 1) The permittee shall operate and maintain the emergency engine over the entire life of the engine. [§60.4206]
- 2) The permittee shall purchase diesel fuel that meets the requirements of §80.510(b) for non-road diesel fuel. [§60.4207(b)]
- 3) The permittee shall install a non-resettable hour meter prior to startup of the engine, if the emergency engine does not meet the standards in §89.112 and §89.113, [§60.4209(a)]
- 4) The permittee shall operate and maintain the emergency engine and any associated control device according to the manufacturer's emission-related written instructions. [§60.4211(a)(1)]
- 5) The permittee shall change only those emission-related settings that are permitted by the manufacturer. [§60.4211(a)(2)]
- 6) The permittee shall comply by purchasing an engine certified to the emission standards in §60.4205(b) for the same model year and maximum engine power. The engine shall be installed and configured according to the manufacturer's emission-related specifications, except as permitted in §60.4211(g). [§60.4211(c)]
- 7) If the permittee owns or operates an emergency stationary ICE, the permittee shall operate the emergency stationary ICE according to the requirements below. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If the permittee does not operate the engine according to the requirements outlined below, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [§60.4211(f)]
  - a) There is no time limit on the use of emergency stationary ICE in emergency situations.
  - b) The permittee may operate the emergency stationary ICE for any combination of the purposes specified in below for a maximum of 100 hours per calendar year. Any operation for non-

emergency situations as allowed by (7)(c) of this section counts as part of the 100 hours per calendar year allowed by this paragraph.

- i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
  - ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
  - iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
- c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (7)(b) of this section. Except as provided in paragraph (7)(c)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
- i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
    - (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
    - (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
    - (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
    - (4) The power is provided only to the facility itself or to support the local transmission and distribution system.
    - (5) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
- 8) If the permittee does not install, configure, operate, and maintain the emergency engine and any associated control device according to the manufacturer's emission-related written instructions, or if the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance as follows: [§60.4211(g)]

- a) The permittee shall keep a maintenance plan and records of conducted maintenance and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§60.4211(g)(2)]

**Performance Testing:**

The permittee shall refer to §60.4212 for performance testing requirements for engines required to conduct an initial performance test under §60.4211(g)(2).

**General Provisions**

The permittee shall refer to Table 8 to 40 CFR Part 60, Subpart IIII for 40 CFR Part 60, Subpart A applicability.

**Recordkeeping and Reporting:**

- 1) The permittee shall retain records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter, if the emergency engine does not meet the emission standards for new non-road CI engines for the same model year and maximum engine power in §89.112 and §89.113 for all pollutants, the permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. [§60.4214(b)]
- 2) The permittee shall retain records of any corrective action taken after the backpressure monitor has notified the permittee that the high backpressure limit of the engine is approached , if the emergency engine is equipped with a diesel particulate filter,. [§60.4214(c)]
- 3) The permittee shall maintain all records either in paper or electronic format, and shall retain them for at least five years after the date of occurrence.
- 4) The permittee shall make all records available immediately to Missouri Department of Natural Resources' personnel upon request.
- 5) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after an exceedance of the emission limitations or any malfunction which may cause an exceedance.
- 6) The permittee shall report any deviations from the emission standards, operational limitations, performance testing, general provisions, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 002</b>	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	
<b>Emission Unit</b>	<b>Description</b>
EP-28	Diesel Emergency Generator, 315 HP

**Emission Limitations:**

The permittee shall not emit more than 500 ppm<sub>v</sub> of SO<sub>2</sub> or more than 35 mg/m<sup>3</sup> of H<sub>2</sub>SO<sub>4</sub> or SO<sub>3</sub> or any combination of those gases averaged on any consecutive three-hour time period.

**Operational Limitation:**

The emergency engine shall only combust diesel containing less than 0.05 percent sulfur.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain fuel purchase receipts indicating the sulfur content of the diesel fuel.
- 2) The permittee shall make available all records immediately to the Department of Natural Resources' personnel upon request.
- 3) The permittee shall maintain all records for five years

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 2) The permittee shall report any deviations from the emission standards, operational limitations, performance testing, general provisions, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

## IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the 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 as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

### **10 CSR 10-6.045 Open Burning Requirements**

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### **10 CSR 10-6.060 Construction Permits Required**

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

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

#### **10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

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

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

#### **10 CSR 10-6.150 Circumvention**

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

**10 CSR 10-6.165 Restriction of Emission of Odors**

**This requirement is a State Only permit requirement.**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

**10 CSR 10-6.170**

**Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

**Emission Limitation:**

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

**10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

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

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

**10 CSR 10-6.280 Compliance Monitoring Usage**

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

**40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.

- d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

## V. General Permit Requirements

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

### **10 CSR 10-6.065(6)(C)1.B Permit Duration**

### **10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits**

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

### **10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements**

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A 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 semiannual 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(6)(C)1.D Risk Management Plan Under Section 112(r)**

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

#### **10 CSR 10-6.065(6)(C)1.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **10 CSR 10-6.065(6)(C)1.G 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 pursuant to 10 CSR 10-6.065(6)(C)1.

**10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

**10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios**

None

**10 CSR 10-6.065(6)(C)3 Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions 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(6)(C)6 Permit Shield**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The applicable requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

#### **10 CSR 10-6.065(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(6)(C)8 Operational Flexibility**

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement

Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.065(6)(C)9 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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.
  - 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; and
  - d) The permit shield shall not apply to these changes.

### **10 CSR 10-6.020(2)(R)34 Responsible Official**

The application utilized in the preparation of this permit was signed by Mr. Gary S. O'Toole, General Manager Finishing Plant. 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(6)(E)6 Reopening-Permit for Cause**

This permit shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MoDNR 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,
- 3) 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,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

### **10 CSR 10-6.065(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.



## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

Walsworth Publishing Company operates a yearbook printing installation. The paper pages go through lithographic printing presses before being cut, bound, and shipped. The installation is a major source of VOCs. The installation is not a named source on the list of installations listed in 10 CSR 10-6.020. The installation is located in Linn County, an attainment area for all criteria pollutants.

The following equipment has been removed from the facility and therefore has been removed from this permit:

EP-04J Five Color Heidelberg SM-52 non-heatset lithographic press  
 EP-31 Hot Melt Glue Application

### Updated Potential to Emit and Reported Air Pollutant Emissions, tons per year

Pollutants	Potential to Emit <sup>1, 2, 3</sup>	2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	0.33	0.03	0.04	0.04	0.03	0.02
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.31	0.03	0.04	0.04	0.03	0.02
Sulfur Oxides (SO <sub>x</sub> )	0.19	--	0.01	--	--	--
Nitrogen Oxides (NO <sub>x</sub> )	4.41	0.44	0.55	0.50	0.42	0.33
Volatile Organic Compounds (VOC)	< 250	74.05	79.91	67.77	70.53	92.31
Carbon Monoxide (CO)	3.33	0.28	0.30	0.10	0.08	0.06
Hazardous Air Pollutants <sup>4</sup> (HAPs)	< 10/25	--	--	--	--	--
Glycol Ethers	5.34	--	--	--	--	--
Isopropyl Benzene	1.76	--	--	--	--	--
Xylene	2.09	--	--	--	--	--
Hexane	0.20	--	--	--	--	--
Diethanolamine	3.00	--	--	--	--	--
Naphthalene	0.15	--	--	--	--	--

Pollutants	Potential to Emit <sup>1, 2, 3</sup>	2016	2015	2014	2013	2012
Alkyl Acrylate Ester	0.50	--	--	--	--	--

<sup>1</sup>Potential emissions are based upon 8,760 hours of uncontrolled annual operation unless otherwise noted:

- ◆ Potential emissions of HAP are highly dependent upon the type of ink/solvent/cleaner/plate developer/etc. used. Potential emission calculations for EP-04A, EP-04E, EP-04F, EP-04G, EP-04H, EP-04I, EP-04J, EP-24A, EP-25A, EP-25B, EP-26A, EP-26B, EP-26C, and EP-27A were based upon a mass balance of the types of ink/solvent/cleaner/plate developer/etc. used at the installation from 2010 – 2014 as reported in the facility’s annual EIQ. Any changes to the types of ink/solvent/cleaner/plate developer/etc. may result in changes to this potential to emit and/or require the facility to obtain a construction permit.
- ◆ Potential emissions of EP-28 were evaluated at 500 hours of annual operation due to EPA’s guidance document *Calculating Potential to Emit (PTE) for Emergency Generators* (September 6, 1995).

<sup>2</sup>The installation is limited by Permit Condition PW001 to 250.0 tons per year VOC to avoid PSD.

<sup>3</sup>Potential emissions were pulled from Construction Permit 122015-012, Issued December 22, 2015.

<sup>4</sup>The installation does emit HAPS; however, the installation reports their HAP emissions as VOCs as explained in 10 CSR 10-6.110 - *Reporting Emission Data, Emission Fees, and Process Information*.

### 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) Part 70 Operating Permit Application, received June 21, 2017;
- 2) 2016 Emissions Inventory Questionnaire, received April 21, 2017; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Construction Permit 0195-010, Issued January 5, 1995
- 5) Construction Permit 0195-011, Issued January 5, 1995
- 6) Construction Permit 042000-013, Issued April 14, 2000
- 7) Construction Permit 042001-009, Issued April 4, 2001
- 8) Construction Permit 052001-004, Issued April 23, 2001
- 9) Construction Permit 062002-002, Issued May 15, 2002
- 10) Construction Permit 102002-002, Issued September 9, 2002
- 11) Construction Permit 102002-010, Issued September 16, 2002
- 12) Construction Permit 062003-022, Issued June 11, 2003
- 13) No Construction Permit Required Determination, Issued January 13, 2006
- 14) Construction Permit 012007-011, Issued January 17, 2007
- 15) Construction Permit 122007-004, Issued December 12, 2007
- 16) Construction Permit 042011-003, Issued April 14, 2011
- 17) Construction Permit 022015-008, Issued February 11, 2015
- 18) Construction Permit 122015-012, Issued December 22, 2015

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

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

None

### **Other Air Regulations Determined Not to Apply to the Operating Permit**

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

10 CSR 10-6.100 *Alternate Emission Limits* is not applicable to the installation and has not been applied within this permit. This rule applies to installations that emit VOC in ozone nonattainment areas. [10 CSR 10-6.100(1)(A)] The installation is in an ozone attainment area.

10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-6.405(1)(E) exempts installations that are fueled exclusively by natural gas.

### **Construction Permit History**

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

Construction Permit 0195-010, Issued January 5, 1995:

- ◆ This de minimis construction permit is for the installation of EP-04B Six Color Komori Lithrone 40 Model L-640-III Non-heatset Sheet-fed Offset Lithographic Printing Press.
- ◆ The printing press is no longer located at the installation; therefore, the special conditions of this construction permit have not been included within this permit.

Construction Permit 0195-011, Issued January 5, 1995:

- ◆ This de minimis construction permit is for the installation of Four Color Komori Lithrone 40 Model L-440-III Non-heatset Sheet-fed Offset Lithographic Printing Press with a Coater.
- ◆ The printing press is no longer located at the installation; therefore, the special conditions of this construction permit have not been included within this permit.

Construction Permit 042000-013, Issued April 14, 2000:

- ◆ This de minimis construction permit is for the installation of four new 700 ft/min cold set web presses.
- ◆ The printing presses are no longer located at the installation; therefore, the special conditions of this construction permit have not been included within this permit.

Construction Permit 042001-009, Issued April 4, 2001:

- ◆ This de minimis construction permit is for the installation of a new six color 40" Komori non-heatset, offset lithographic printing press with a coater.
- ◆ The printing press is no longer located at the installation; therefore, the special conditions of this construction permit have not been included within this permit.

Construction Permit 052001-004, Issued April 23, 2001:

- ◆ This de minimis construction permit is for the installation of EP-04C Five Color Komori Lithrone 40 Model L-440 Non-heatset Sheet-fed Offset Lithographic Printing Press with a Coater.
- ◆ The printing press is no longer located at the installation; therefore, the special conditions of this construction permit have not been included within this permit.

Construction Permit 062002-002, Issued May 15, 2002:

- ◆ This general construction permit is for the installation of EP-24A Six Color Solna 96 Heatset Web Offset Lithographic Printing Press and EP-24B 2.0 MMBtu/hr Natural Gas Dryer.

- ◆ Special Condition 1 of this construction permit is the same as Special Condition 2 of Construction Permit 122015-012 which has been applied within this permit (see Permit Condition PW001).

Construction Permit 102002-002, Issued September 9, 2002:

- ◆ This de minimis construction permit is for the installation of EP-25 Sakurai SC 102 UV Cylinder Press with associated Screen Making Equipment.
- ◆ Special Condition 1 of this construction permit is the same as Special Condition 2 of Construction Permit 122015-012 which has been applied within this permit (see Permit Condition PW001).

Construction Permit 102002-010, Issued September 16, 2002:

- ◆ This de minimis construction permit is for the installation of EP-26 Four Color HP-indigo 3000 Digital Press to print short run books. EP-26 is no longer located at the installation; therefore, the special condition of this construction permit has not been included within this permit.

Construction Permit 062003-022, Issued June 11, 2003:

- ◆ This de minimis construction permit is for the retrofit of EP-04D Four color Komori Lithrone 40 L-440 Non-heatset Sheet-fed Offset Lithographic Printing Press with an Epic Products Internal Corp. aqueous coater and for the installation of EP-01 (4) Creo Platemakers and Film Cleaning capable of making 27 plates per hour each.
- ◆ The printing press is no longer located at the installation.
- ◆ EP-01 (4) Creo Platemakers and Film Cleaning capable of making 27 plates per hour each are still located at the installation.
- ◆ Special Condition 1 of this construction permit is the same as Special Condition 2 of Construction Permit 122015-012 which has been applied within this permit (see Permit Condition PW001).

No Construction Permit Required Determination, Issued January 13, 2006:

- ◆ This no construction permit required determination is for the installation of EP-04E Five Color Komori Lithrone 40 L-540 Non-heatset Lithographic Printing Press.

Construction Permit 012007-011, Issued January 17, 2007:

- ◆ This de minimis construction permit is for the installation of EP-04F Eight Color Heidelberg SM-102P Non-heatset Offset Lithographic Printing Press
- ◆ Special Condition 1 of this construction permit is the same as Special Condition 2 of Construction Permit 122015-012 which has been applied within this permit (see Permit Condition PW001).

Construction Permit 122007-004, Issued December 12, 2007:

- ◆ This de minimis construction permit is for the installation of EP-04G Eight Color Heidelberg Lithographic Printing Press.
- ◆ Special Condition 1 of this construction permit is the same as Special Condition 2 of Construction Permit 122015-012 which has been applied within this permit (see Permit Condition PW001).

Construction Permit 042011-003, Issued April 14, 2011:

- ◆ This general construction permit is for the installation of EP-27A Baker Perkins G-14 Lithographic Web Press and EP-27B 5.567 MMBtu/hr Natural Gas Dryer
- ◆ Special Conditions 1 - 3 have been applied within this permit (see Permit Condition PW001). Attachment A was revised to include a new source of VOC emissions. Since the issuance of this construction permit the installation has installed EP-28 Diesel Emergency Generator which emits VOCs through the combustion of diesel. EP-28 did not require a construction permit as it met a

construction permit exemption under 10 CSR 10-6.061(3)(A)2.BB. See Permit Condition 001 for additional requirements.

No Construction Permit Required Determination, Issued September 26, 2012:

- ◆ This no construction permit required determination is for the installation of EP-04H Eight Color Heidelberg Non-heatset Lithographic Sheet-fed Printing Press.

Construction Permit 022015-008, Issued February 11, 2015:

- ◆ This general construction permit is for the installation of a Heidelberg SM-102 8 color non-heatset lithographic press, a Heidelberg PM-52 4-color non-heatset lithographic press and a Sakurai SC 102 UV screen press. The Sakurai SC 102 UV Screen press was not installed and instead used for parts.
- ◆ Special Conditions 1 - 3 have been applied within this permit (see Permit Condition PW001).

Construction Permit 122015-012, Issued December 22, 2015:

- ◆ This general construction permit is for the installation of a Fuji Film J Press 720S digital press
- ◆ Special Conditions 1 - 3 have been applied within this permit (see Permit Condition PW001).

#### **New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60, Subparts D, Da, Db, and Dc – *Standards of Performance for Steam Generating Units* are not applicable to the installation and have not been applied within this permit. Subparts D and Da are only applicable to steam generating units with a heat input rate greater than 250 MMBtu/hr. [§60.40(a) and §60.40a(a)] Subpart Db is only applicable to steam generating units with a heat input rate greater than 100 MMBtu/hr. [§60.40b(a)] Subpart Dc is only applicable to steam generating units with a heat input rate greater than 10 MMBtu/hr. [§60.40c(a)] EP-22 Natural Gas Fired Boiler is only rated at 0.4 MMBtu/hr.

40 CFR Part 60, Subparts K, Ka, and Kb – *Standards of Performance for Storage Vessels* are not applicable to the installation and have not been applied within this permit. Subparts K and Ka are only applicable to storage vessels greater than 40,000 gallons in capacity. [§60.110(a) and §60.110a(a)] Subpart Kb is applicable to storage vessels greater than 75 m<sup>3</sup> (19,812 gallons) in capacity. [§60.110b(a)] The installation's largest storage tank is the 400 gallon diesel storage tank for the emergency generator.

40 CFR Part 60, Subpart QQ – *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing* is not applicable to the installation and has not been applied within this permit. The provisions of this subpart apply to each publication rotogravure printing press. [§60.430(a)] None of the printing presses at the installation are rotogravure.

40 CFR Part 60, Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* is applicable to EP-28 Diesel Emergency Generator and has been applied within this permit (see Permit Condition 001).

#### **Maximum Achievable Control Technology (MACT) Applicability**

40 CFR Part 63, Subpart KK – *National Emission Standard for the Printing and Publishing Industry* is not applicable to the installation and has not been applied within this permit. The provisions of this subpart apply to publication rotogravure, product and packaging rotogravure, and wide-web

flexographic printing presses located at major sources of HAPs. [§63.820(a)(1)] The installation is a minor source of HAPs.

40 CFR Part 63, Subpart JJJJ - *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating* is not applicable to the installation and has not been applied within this permit. The provisions of this subpart apply to facilities with web coating operations that are a major source of HAPs. [§63.3290] The installation is a minor source of HAPs.

40 CFR Part 63, Subpart OOOO - *National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles* is not applicable to the installation and has not been applied within this permit. The provisions of this subpart apply to facilities with web coating lines that are a major source of HAPs. [§63.4281(b)] The installation is a minor source of HAPs.

40 CFR Part 63, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* is applicable to the installation, but has not been applied within this permit. The provisions of this subpart apply to stationary reciprocating internal combustion engines (RICE). [§63.6580] The only requirement for a new stationary RICE at an area source is compliance with 40 CFR Part 60, Subpart IIII. [§63.6590(c)] 40 CFR Part 60, Subpart IIII has been applied within this permit (see Permit Condition 001).

40 CFR Part 63, Subpart JJJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* is not applicable to the installation and has not been applied within this permit because the boilers are all fueled with natural gas, which is exempt under §63.11195.

#### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

None

#### **Compliance Assurance Monitoring (CAM) Applicability**

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

#### **Greenhouse Gas Emissions**

Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO<sub>2</sub> emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub> emissions were not included within this permit. The applicant may be required to report the data directly to EPA. The public may obtain CO<sub>2</sub> emissions data for this installation by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

### **Other Regulatory Determinations**

10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin* is applicable to the installation, has been applied within this permit. The installation's potential emissions of particulate matter were calculated to be 0.33 tons per year (0.075 pounds per hour). As the installation's potential emissions of particulate matter are quite low no further monitoring, recordkeeping, or reporting is required at this time.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation, but has not been applied within this permit. The installation does have visible air emissions sources; however, the installation's potential emissions of particulate matter were calculated to be 0.33 tons per year (0.075 pounds per hour) and the installation is not expected to exceed the opacity limits while being properly maintained and operating. No further monitoring, recordkeeping, or reporting is required at this time.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* this rule has been applied in this permit. See Permit Condition 002. The following combustion units at this facility are exempt under 10 CSR 10-6.260(1)(A)(2) as they exclusively combust pipeline grade natural gas: EP-20 Space Heaters, EP-22 Boiler, EP-27B Dryer, and EP-29 Hot Water Heaters.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions* the facility is exempt from this rule. The emergency generator, EP-28, is exempt under 10 CSR 10-6.261(1)(C) as the emergency generator is subject to a more stringent SO<sub>2</sub> emission limit under 40 CFR 60 Subpart III, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*. The following combustion units at this facility are exempt under 10 CSR 10-6.261(1)(A) as they exclusively combust pipeline grade natural gas: EP-20 Space Heaters, EP-22 Boiler, EP-27B Dryer, and EP-29 Hot Water Heaters.

### **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 APCA'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 APCA a schedule for achieving compliance for that regulation(s).

## Response to Public Comments

On August 25, 2017 we received two comments from Mr. Mark A. Smith, Air Permitting and Compliance Branch, U.S. EPA's Region VII office in Lenexa, Kansas. The comments are addressed in the order in which they appear within the letter(s).

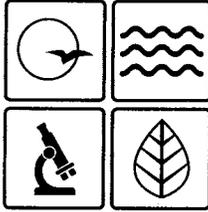
**Comment #1:** The Maximum Achievable Control Technology (MACT) Applicability section in the Statement of Basis (SB-5) indicates that 40 CFR Part 63, Subpart KK-National Emission Standards for the Printing and Publishing Industry; 40 CFR Part 63, Subpart JJJ-National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating; and 40 CFR Part 63, Subpart 0000-National Emission Standards for Hazardous Air Pollutants: Printing, Coating and Dyeing of Fabrics and Other Textiles; do not apply to Walsworth-Marceline because "the installation is a minor source of HAPs." When characterizing a hazardous air pollutant (HAP) emission source, EPA's regulatory language refers to "major sources" (i.e. greater than 10 tons of any single HAP in a 12-month consecutive period or greater than 25.0 tons of combined HAP in any 12-month consecutive period) and if the sources emissions are below the 10/25-ton threshold, the source is defined as an "area source." Based on the draft permit record on public notice, the major source/area source determination of the Walsworth-Marceline facility cannot be confirmed. In the Updated Potential to Emit and Reported Air Pollutant Emissions table on page SB-1, the Hazardous Air Pollutant Potential to Emit is shown as 12.86 tons per year. If this potential to emit is a single HAP, the Walsworth-Marceline installation would be a "major source" of HAP. Footnote 4, associated with this Updated Potential to Emit and Reported Air Pollutant Emissions table on page SB-1 indicates the installation reports their HAP emissions as VOC's, as explained in 10 CSR 10-6.110- Reporting Emissions Data, Emission Fees and Process Information. 10 CSR 10-6.110 allows installations to report HAP's as VOC's for emission inventory purposes and for emission fee calculation purposes. However, this combining of HAPs and VOCs is not appropriate for the determination of major source status. Walsworth-Marceline reports an average VOC emission of 76.91 tons per year from 2012 through 2016 and without a clear determination of the split between HAP and VOC, there is no evidence that this facility is not a major source. Therefore, EPA suggests that MDNR work with Walsworth-Marceline and consider including a voluntary HAP emission limitation with adequate compliance verification monitoring to confirm the installations designation as an "area source" of HAPs.

**Response to Comment:** The potential to emit for the HAP emissions has been expanded to show each individual HAP. As the PTE is below 10 TPY for each individual HAP and 25 TPY for the total HAPS, the facility has been classified as an area source of HAPS.

**Comment #2:** In the Other Regulatory Determinations section of the Statement of Basis (pages SB-6 and SB-7) it is indicated in 10 CSR 10-6.261-Control of Sulfur Dioxide Emissions; that Walsworth-Marceline is exempt from the requirements of this state rule. However, the Other Regulatory Determinations section in the Statement of Basis, does not explain the absence of the applicable requirements in 10 CSR 10- 6.260-Restriction of Emission of Sulfur Compounds. 10 CSR 10-6.065(6)(C)l says every operating permit issued shall contain all requirements applicable to the installation at the time of issuance. 10 CSR 10-6.020(A) 54. A. defines applicable requirements to include any standard or requirement provided for in the implementation plan approved and promulgated by the United States Environmental Protection Agency. 10 CSR 10-6.260 is included in the EPA approved Missouri State Implementation Plant (SIP) and therefore is an applicable requirement to be

included in this operating permit. EPA recognizes that Walsworth-Marceline may be exempt from the requirements of 10 CSR 10-6.260; much like the exemptions described in 10 CSR 10-6.261. However, EPA encourages MDNR to recognize the applicability of 10 CSR 10-6.260 in the Statement of Basis.

**Response to Comment:** 10 CSR 10-6.260 has been added back into the permit and to the statement of basis.



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

NOV 29 2017

Mr. Gary S. O'Toole  
Walsworth Publishing Company  
306 North Kansas Avenue  
Marceline, MO 64658

Re: Walsworth Publishing Company, 115-0001  
Permit Number: OP2017-084

Dear Mr. O'Toole:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty 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 have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:kwj

Enclosures

c: PAMS File: 2017-06-066



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