STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

March 9, 2010

Don Vietz, Director of Plant Services
Pacific Press Publishing Association
P.O. Box 5353
Nampa, ID 83653

RE: Facility ID No. 027-00028, Pacific Press Publishing Association, Nampa
Final Permit Letter

Dear Mr. Vietz:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2010.0006 to Pacific Press Publishing Association for the installation of a dust collection system located at Nampa, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on January 21, 2010. This permit is effective immediately and replaces PTC No. 027-00028, issued on April 1, 2002. This permit does not release Pacific Press Publishing Association from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard, Boise, ID 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, Air Quality Science Officer, at (208) 373-0419 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

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Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Darrin Pampaian (for Mary Capiral) at (208) 373-0502 or **darrin.pampaian**@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\dp Project No. P-2010.0006

Enclosures

Air Quality PERMIT TO CONSTRUCT State of Idaho Department of Environmental Quality	PERMIT NUMBER	CLASS	SIC
	P-2010.0006	B	2721
	FACILITY ID	AQCR	NAICS
	027-00028	64	511120
	ZONE	UTM COORDINATES (km)	
	11	536.5	4,827.0

PERMITTEE			
Pacific Press Publishing Association			
PROJECT			
Permit to Construct Modification			
MAILING ADDRESS	**CITY**	**STATE**	**ZIP**
P.O. Box 5353	Nampa	ID	83653
FACILITY CONTACT	**TITLE**	**TELEPHONE**	
Don Vietz	Director of Plant Services	(208) 465-2572	
RESPONSIBLE	**TITLE**	**TELEPHONE**	
Don Upson Sr.	CFO	(208) 465-2536	
EXACT PLANT LOCATION		**COUNTY**	
1350 North Kings Road Nampa, ID 83687		Canyon	
GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS			
Books and periodicals publishing			

PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

Mary Capiral		
MARY CAPIRAL, PERMIT WRITER	**DATE ISSUED**	March 9, 2010
MIKE SIMON, STATIONARY SOURCE MANAGER		

PERMIT TO CONSTRUCT SCOPE

Purpose

1. This is a modification of a permit to construct. The applicant has proposed to install a dust collection system to control particulate matter (PM_{10}) emissions from the Kolbus Ratio Binder and Muller Book Splitting Saw. Prior to the proposed modification, emissions from the Kolbus Ratio Binder and Muller Book Splitting Saw were passed through a filtering system inside the building and then returned as supply air in the building. Thus, there were no point discharges from these sources. PM_{10} emissions from these two processes clogged the existing filtering system. To solve this issue, PM_{10} emissions from the Kolbus Ratio Binder and Muller Book Splitting Saw will be diverted from the building air handling system to the new dust collection system and then discharged into the atmosphere.
2. Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
3. This PTC replaces Permit to Construct No. 027-00028, issued on April 1, 2002. Determinations made in conjunction with the 1985 Permit to Construct (PTC) concerning equipment exempt from permitting or not included in the 1985 PTC are not superseded.
4. The emission sources regulated by this permit are listed in the following table.

Table 1 REGULATED SOURCES

Source Descriptions	Emission Controls
6-unit Web Offset Printing Press Manufacturer: Harris Model: M200 Max. hours of operation: 4,493 hours per any 12 consecutive months Year manufactured: 1977 Year installed: 1984	Regenerative Thermal Oxidizer Mfr.: Airex Serial No.: 2378-3.0 Construction Date: March 2002 Fuel Type: natural gas
Dryers (upper and lower oven) Mfr.: Megtec Model: M2000 Heat input rating: 3.67 MMBtu/hr Fuel Type: natural gas Max. hours of operation: 4,493 hours per any 12 consecutive months Year manufactured: 1979 Year installed: 2002	
Ratio Binder Mfr.: Kolbus Model: KM-470 Year manufactured: 1990	Dust Collection System with Cartridge Filter System Mfr.: Puhl Filter Mfr.: Campcorp Model: CA8 Flowrate: 4,350 cfm Construction Date: 2010
Book Splitting Saw Mfr.: Muller Model: 3601 Year installed: 2005	

HARRIS WEB PRESS AND MEGTEC DRYERS

Process Description

5. Process Description

The six-unit Harris Web Offset Printing Press applies ink and water-based fountain solution to a rotating plate. The image is transferred to a rotating blanket cylinder and, then, to a sheet of paper moving through the press. Two natural-gas fired drying ovens (upper and lower oven) are used to dry ink. Each drying oven is equipped with a Maxon Ovenpak pure nozzle mix burner.

6. Emission Controls Description

Emissions from the Harris web press and Megtec dryers are controlled by an Airex regenerative thermal oxidizer (RTO) located on the common stack used by the Harris web press, Megtec dryer (lower), and Megtec dryer (upper).

Table 2 HARRIS WEB PRESS AND MEGTEC DRYERS DESCRIPTION

Emissions Units / Processes	Emission Control Devices
6-unit Web Offset Printing Press Manufacturer: Harris Model: M200 Max. hours of operation: 4,493 hours per any 12 consecutive months Year manufactured: 1977 Year installed: 1984	Regenerative Thermal Oxidizer Mfr.: Airex Serial No.: 2378-3.0 Construction Date: March 2002 Fuel Type: natural gas
Dryers Mfr.: Megtec Model: MC2000 Heat input rating: 3.67 MMBtu/hr Max. hours of operation: 4,493 hours per any 12 consecutive months Year manufactured: 1979 Year installed: 2002 Fuel Type: natural gas	

Emission Limits

7. Opacity Limit

Emissions from the web press, dryers, and regenerative thermal oxidizer (RTO) stacks, or any other stack, vent, or functionally equivalent opening associated with the web press, dryers, and RTO shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

8. Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776]

Operating Requirements

9. Operational Hours Limit

The maximum annual hours of operation of the web press and dryers shall not exceed 4,493 hours per any consecutive 12-month period.

[PTC No. 027-00028, issued April 1, 2002]

10. Regenerative Thermal Oxidizer (RTO)

The permittee shall install and operate a regenerative thermal oxidizer (RTO) to control emissions from the web press and dryers. Emissions emitted from the web press and dryers shall be captured and routed to the RTO.

[March 9, 2010]

11. Regenerative Thermal Oxidizer (RTO) Catalytic Bed and Combustion Chamber Operating Temperatures

The regenerative thermal oxidizer (RTO) catalytic bed minimum operating temperature must be greater than 1200°F and the combustion chamber operating temperature must be less than 2000°F. Automatic fault setpoint temperatures shall be established that shut the RTO and web press down if the temperature drops below 1200°F at the catalytic bed or exceeds 2000°F at the combustion chamber.

[March 9, 2010]

12. Permitted Fuel

The dryers and regenerative thermal oxidizer (RTO) shall only combust natural gas as fuel.

[March 9, 2010]

Monitoring and Recordkeeping Requirements

13. Operations and Maintenance Manual Requirements

The permittee shall maintain an Operations and Maintenance Manual for the regenerative thermal oxidizer (RTO), which describes the procedures that will be followed to comply with the General Compliance General Provision and the manufacturer specifications for the air pollution control device. This manual shall remain onsite at all times and shall be made available to Department representatives upon request.

[PTC No. 027-00028, issued April 1, 2002]

14. Monitoring of Regenerative Thermal Oxidizer Temperature

The permittee shall monitor and record, on a daily basis, fault events that cause shutdown of the regenerative thermal oxidizer (RTO). The reason for the fault event and the action taken to correct the fault shall also be recorded.

[March 9, 2010]

15. Visible Emissions Monitoring

The permittee shall monitor and record visible emissions from the web press and dryers stacks weekly when operating to demonstrate compliance with the Opacity Limit Permit Condition. The inspection shall consist of a see/no see evaluation for the web press and dryers stacks. If any visible emissions are present from the web press and dryers stacks, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and opacity test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[March 9, 2010]

16. Odor Complaints

The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.211.01]

17. Operational Hours Monitoring and Recordkeeping

To demonstrate compliance with the Operational Hours Limit Permit Condition, the permittee shall monitor and record the amount of operations hours of the web press and dryers on a daily basis. The annual operational hours shall be determined by summing the amount of operational hours per day over each previous consecutive 12-month period.

[March 9, 2010]

KOLBUS RATIO BINDER AND MULLER BOOK SPLITTING SAW

Process Description

18. Process Description

The Muller Book Splitting Saw is used to cut paper while the Kolbus Ratio Binder is used to bind books together using hot glue. The ratio binder has a revolving wheel with 18 cutting knives that spin and trim the binding edge of books (the spine) to a smooth flat surface so that book covers can be adhered to the books. Particulate matter emissions result from the operation of the ratio binder and book splitting saw. Emissions of VOCs and one TAP (vinyl acetate) result from the hot gluing operation. The gluing operation emissions are directed to a vent to the atmosphere. In February 14, 2002, Pacific Press determined that VOC and TAP emissions from the hot gluing operation are exempt from PTC requirements.

19. Emission Controls Description

Particulate matter emissions from the ratio binder and book splitting saw are controlled by a dust collection system equipped with a cartridge filter.

Table 3 KOLBUS RATIO BINDER AND MULLER SPLITTING SAW DESCRIPTION

Emissions Units / Processes	Emission Control Devices
Ratio Binder Manufacturer: Kolbus Model: KM-470 Year manufactured: 1990	Dust Collection System with Cartridge Filter System Mfr.: Puhl Filter Mfr.: Campcorp Model: CA8 Construction Date: 2010
Book Splitting Saw Manufacturer: Muller Model: 3601 Year installed: 2005	

[March 9, 2010]

Emission Limits

20. Emission Limits

The emissions from the ratio binder and book splitting saw stack shall not exceed any emissions rate limit in the following table.

Table 4 KOLBUS RATIO BINDER AND MULLER BOOK SPLITTING SAW EMISSION LIMITS[a]

Source Description	PM_{10}[b]	
	lb/hr[c]	T/yr[d]
Ratio Binder and Book Splitting Saw	0.19	0.82

a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
b) Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.81.
c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.
d) Tons per any consecutive 12-calendar month period.

[March 9, 2010]

21. Opacity Limit

Emissions from the ratio binder and book splitting saw stacks, or any other stack, vent, or functionally equivalent opening associated with the ratio binder and book splitting saw, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[March 9, 2010]

Operating Requirements

22. Cartridge Filter System

The permittee shall install and operate a cartridge filter system to control PM_{10} emissions from the ratio binder and book splitting saw.

[March 9, 2010]

23. Cartridge Filter Grain Loading

In order to demonstration compliance with the Emission Limits Permit Condition, the outlet grain loading on all filters shall not exceed 0.005 grains per dry standard cubic foot (0.005 gr/dscf) of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM_{10}).

[March 9, 2010]

24. Flow Rate of Exhaust Filter

In order to demonstration compliance with the Emission Limits Permit Condition, the exhaust flow rate from the cartridge filters shall not exceed 4,350 cubic feet per minute (4,350 cfm) based on 24-hour average.

[March 9, 2010]

25. Visible Emissions Monitoring

The permittee shall monitor and record visible emissions from the ratio binder and book splitting saw stacks weekly when operating to demonstrate compliance with the Opacity Limit Permit Condition. The inspection shall consist of a see/no see evaluation for the ratio binder and book splitting saw stacks. If any visible emissions are present from the ratio binder and book splitting saw stacks, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and opacity test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[March 9, 2010]

26. Cartridge Filter System Procedures

Within 60 days of initial start-up, the permittee shall have developed a Filter System Procedures document for the inspection and operation of the cartridge filter system which controls emissions from the ratio binder and book splitting saw. The Filter System Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Filter System Procedures document shall describe the procedures that will be followed to comply with the General Compliance General Provision and shall contain requirements for weekly see-no-see visible emissions inspections of the cartridge filter. The inspection shall occur during daylight hours and under normal operating conditions.

The Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the cartridge filter at anytime. At a minimum the document shall include:

- procedures to determine if cartridges are ruptured; and
- procedures to determine if cartridges are not appropriately secured in place.

The Filter System Procedures document shall be submitted to DEQ within 60 days of permit issuance for review and comment and shall contain a certification by a responsible official. Any changes to the Filter System Procedures document shall be submitted within 15 days of the change.

The Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating requirements specified in the Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[March 9, 2010]

27. Maintenance and Operation of Cartrigde Filter System

The permittee shall maintain and operate the cartridge filter system according to the manufacturer's specifications and recommendations and the Filter System Procedures document.

[March 9, 2010]

Monitoring and Recordkeeping Requirements

28. Monitoring and Recordkeeping of Cartridge Filter System

The monitoring and recordkeeping requirements specified in the Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions. The Permittee shall maintain records of the results of each cartridge filter inspection in accordance with the Monitoring and Recordkeeping General Provision. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

[March 9, 2010]

29. Recordkeeping

The permittee shall comply with the recordkeeping requirements of the Recordkeeping General Provision.

PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

30. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

[Idaho Code §39-101, et seq.]

31. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

32. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

33. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

34. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:

- A notification of the date of initiation of construction, within five working days after occurrence;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

35. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ, at its option, may have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

36. All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

37. Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

38. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records 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. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

39. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

40. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

41. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

42. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

43. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

44. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]