



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR
TONI HARDESTY, DIRECTOR

January 24, 2007

Certified Mail No. 7005 1160 0000 1550 2379

Craig Rogers
Century Publishing Company
5710 E. Seltice Way
Post Falls, Idaho 83854

RE: Facility ID No. 055-00054, Century Publishing Company, Post Falls
Final Permit Letter

Dear Mr. Rogers:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-060128 to Century Publishing Company, 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 August 6, 2006. This permit is effective immediately and replaces PTC No. P-030110, issued on September 3, 2004, the terms and conditions of which no longer apply". This permit does not release Century Publishing Company 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 Coeur d'Alene Regional Offices at 2110 Ironwood Parkway, Coeur d'Alene, Idaho 83814.

A representative of the Coeur d'Alene Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

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 call Robert Baldwin at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\REB\df Project No. 060128

Enclosures

c: Dan Redline, Regional Office
 Bill Rogers, Permit Coordinator
 Bob Baldwin, Permit Writer
 Marilyn Seymore/ Pat Rayne, Air Quality Division
 Laurie Kral, US EPA Region 10
 Permit Binder
 Source File
 Phyllis Heitman (Ltr Only)
 Reading File (Ltr Only)
 Joan Lechtenberg, Public Comment (If Public comment period was done)

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Department of Environmental Quality
ft ³ /hr	cubic feet per hour
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MACT	Achievable Control Technology
MMBtu	million British thermal units
MMBtu/hr	million British thermal units per hour
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
O ₃	ozone
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
TAPs	toxic air pollutants
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060128

Permittee:	Century Publishing Co.	Facility ID No. 055-00054
Location:	Post Falls, Idaho	

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1** This PTC is a modification of the facility's existing PTC. This modification allows for an increase in the amounts of inks and solvents used annually.
- 1.2** This PTC replaces PTC No. P-030110, issued on September 3, 2004, the terms and conditions of which no longer apply.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 REGULATED EMISSIONS SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Oven 1, Harris M1000 Press Sahara S1408S1 rated 2.42 MMBtu/hr	Afterburner, manufactured by TEC, rated at 1.8 MMBtu/hr
2	Web Press 1, manufactured by Harris, Model # M1000	Afterburner, manufactured by TEC, rated at 1.8 MMBtu/hr
3	Oven 2, M10 Press TEC80, rated at 1.82 MMBtu/hr	Afterburner, manufactured by TEC, rated at 1.0 MMBtu/hr
3	Web Press 2, manufactured by Harris, Model # M10 Web Press	Afterburner, manufactured by TEC, rated at 1.0 MMBtu/hr

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2. PRESS LINE 1

2.1 Process Description

Press Line 1 is used for printing and publishing various documents. The various documents are produced on a four-ink web press. After printing, the documents are dried in a 2.42 MMBtu/hr, natural gas-fired drying oven.

2.2 Emissions Control Description

Volatile organic compound emissions from Press Line 1 are controlled by a 1.8 MMBtu/hr, natural gas-fired afterburner.

Table 2.1 PRESS LINE 1 DESCRIPTION

Emissions Unit	Emissions Control Device	Emissions Point
Press Line 1 (includes Web press 1 & Oven 1)	Afterburner	Afterburner stack

Emissions Limits

2.3 Emissions Limits

The VOC emissions from the afterburner stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 PRESS LINE 1 EMISSIONS LIMITS

Source Description	VOC	
	lb/hr	T/yr
Afterburner stack	3.79	10.27

2.4 Visible Emissions Limit

Emissions from the afterburner stack, vent, or other functionally equivalent opening associated with Press Line 1, 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.

Operating Requirements

2.5 Printing Ink VOC Throughput Limit

- The maximum throughput of VOC's contained in the ink shall not exceed a monthly average of 50.1 lb/hr.
- The maximum throughput of VOC's contained in the ink shall not exceed 150.5 tons per any consecutive 12-month period.

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2.6 Solvents VOC Throughput Limit

- The maximum throughput of VOC's contained in the solvents shall not exceed a monthly average of 9.53 lb/hr.
- The maximum throughput of VOC's contained in the solvents shall not exceed 11.43 tons per 12-consecutive month period.

2.7 Press Line 1 Allowable Fuel Type

The Press Line 1 drying oven shall be fired by natural gas exclusively.

2.8 Afterburner Operation

The afterburner shall operate whenever Press Line 1 operates.

Monitoring and Recordkeeping Requirements

2.9 Printing Ink VOC Throughput Monitoring and Recordkeeping Requirements

The permittee shall monitor and record the monthly average throughput of VOC contained in the ink used, expressed as pounds per hour, and annually, expressed as tons per any consecutive 12-month period, to demonstrate compliance with Permit Condition 2.5. The monthly average throughput of VOC contained in the ink shall be determined by dividing monthly VOC throughput by hours of per month of operation. The annual VOC throughput of ink used shall be determined by summing each monthly VOC throughput for the previous consecutive 12-month period. Records of this information shall be kept onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

2.10 Solvents VOC Throughput Monitoring and Recordkeeping Requirements

The permittee shall monitor and record the monthly average throughput of VOC contained in all solvents used, expressed as pounds per hour, and annually, expressed as tons per any consecutive 12-month period, to demonstrate compliance with Permit Condition 2.6. The monthly average throughput of VOC contained in the solvents shall be determined by summing the value and dividing monthly VOC throughput by hours of operation per month of each solvent. These values are summed for the total monthly average. The annual VOC throughput of all cleaning solutions used shall be determined by summing each monthly VOC throughput for the previous consecutive 12-month period. Records of this information shall be kept onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

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2.11 Operations and Maintenance Manual Requirements

The permittee shall have developed an O & M manual for the afterburners that control VOC emissions from Press Line 1 and Press Line 2 (Section 3 of this permit). The O and M manual shall be based on the specifications and recommendations from the manufacturer of the afterburners. The manual shall describe the methods and procedures that will be followed to assure the afterburners, including, the catalytic material are maintained in good working order and operated as efficiently as practical. The O & M manual shall be updated as necessary and shall include, at a minimum, the most recent general descriptions of the equipment; the normal operating conditions and procedures for the equipment; startup, shutdown, and maintenance procedures; upset conditions guidelines; and corrective action procedures. The O & M manual and all revisions thereof shall remain on site at all times and shall be made available to DEQ representatives upon request.

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Permittee:	Century Publishing Co.	Facility ID No. 055-00054
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3. PRESS LINE 2

3.1 Process Description

Press Line 2 is used for printing and publishing various documents. The various documents are produced on a four-ink web press. After printing, the documents are dried in a 1.0 MMBtu/hr, natural gas-fired drying oven.

3.2 Emissions Control Description

Volatile organic compound emissions from Press Line 2 are controlled by a 1.0 MMBtu/hr, natural gas-fired afterburner.

Table 3.1 PRESS LINE 1 DESCRIPTION

Emissions Unit	Emissions Control Device	Emissions Point
Press Line 2 (includes Web press 2 & Oven 2)	Afterburner	Afterburner stack

Emissions Limits

3.3 Emissions Limits

The VOC emissions from the afterburner stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 OVEN 2 STACK EMISSIONS LIMITS

Source Description	VOC	
	lb/hr	T/yr
Afterburner stack	2.88	5.73

3.4 Visible Emissions Limit

Emissions from the afterburner 2 stack, vent, or other functionally equivalent opening associated with Press Line 2, 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.

Operating Requirements

3.5 Printing Ink VOC Throughput Limit

- The maximum throughput of VOC's contained in the ink shall not exceed a monthly average 35.07 lb/hr.
- The maximum throughput of VOC's contained in the ink shall not exceed 75.25 tons per any consecutive 12-month period.

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3.6 Solvents VOC Throughput Limit

- The maximum throughput of VOC's contained in the solvents shall not exceed a monthly average 9.53 lb/hr.
- The maximum throughput of VOC's contained in the solvents shall not exceed 11.43 tons per 12-consecutive month period.

3.7 Press Line 2 Allowable Fuel Type

The Press Line 2 drying oven shall be fired by natural gas exclusively.

3.8 Afterburner Operation

The afterburner shall operate whenever Press Line 2 operates.

Monitoring and Recordkeeping Requirements

3.9 Printing Ink VOC Throughput Monitoring and Recordkeeping Requirements

The permittee shall monitor and record the monthly average throughput of VOC contained in the ink used, expressed as pounds per hour, and annually, expressed as tons per any consecutive 12-month period, to demonstrate compliance with Permit Condition 3.5. The monthly average throughput of VOC contained in the ink shall be determined by dividing monthly VOC throughput by hours of per month operation. The annual VOC throughput of ink used shall be determined by summing each monthly VOC throughput for the previous consecutive 12-month period. Records of this information shall be kept onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

3.10 Solvent VOC Throughput Monitoring and Recordkeeping Requirements

The permittee shall monitor and record the monthly average throughput of VOC contained in all solvents used hourly, expressed as pounds per hour, and annually, expressed as tons per any consecutive 12-month period, to demonstrate compliance with Permit Condition 3.6. The monthly average throughput of VOC contained in the solvents shall be determined by dividing monthly VOC throughput by hours of per month operation. The annual VOC throughput of all solvents used shall be determined by summing each monthly VOC throughput for the previous consecutive 12-month period. Records of this information shall be kept onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

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4. SUMMARY OF EMISSIONS LIMITS

Table 4.1 provides a summary of all emissions limits required by this permit:

Table 4.1 SUMMARY OF EMISSIONS LIMITS

Century Publishing Company, Post Falls Emissions Limits^a - Hourly (lb/hr) and Annual^b (T/yr)		
Source Description	VOC	
	lb/hr	T/yr
Press Line 1	3.79	10.27
Press Line 2	2.88	5.73

^aAs determined by a pollutant-specific EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

^bAs determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emissions rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates. The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

^cIncludes condensibles.

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5. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

1. 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.]

2. 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]

3. 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

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. 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;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times 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 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

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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- c. 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;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. 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

- 6. 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 may, at its option, 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.

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.

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

- 7. 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]

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Excess Emissions

8. 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

9. 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

10. 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

11. 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

12. 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

13. 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.