

DRAFT

AIR EMISSION PERMIT NO. 16100013- 005
Total Facility Oper. Permit - Reissuance

IS ISSUED TO

Brown Printing Co- Div of Gruner & Jahr

BROWN PRINTING CO - WASECA DIVISION
2300 Brown Avenue
Waseca, Waseca County, MN 56093

The emission units, control equipment and emission stacks at the stationary source authorized in this permit re-issuance are as described in the Permit Applications Table.

This permit re-issuance supersedes Air Emission Permit No. 16100013-004 and authorizes the Permittee to operate and modify the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Unless otherwise indicated, all the Minnesota rules cited as the origin of the permit terms are incorporated into the State Implementation Plan (SIP) under 40 CFR § 52.1220 and as such are enforceable by U.S. Environmental Protection Agency (EPA) Administrator or citizens under the Clean Air Act.

Permit Type: Federal; Pt 70/Limits to Avoid NSR;

Operating Permit Issue Date: <issue date>

Expiration Date: <expiration date> – All Title I Conditions do not expire.

Don Smith, P.E., Manager
Air Quality Permits Section
Industrial Division

for John Linc Stine
Commissioner
Minnesota Pollution Control Agency

Permit Applications Table

Permit Type	Application Date	Permit Action
Total Facility Operating Permit - Reissuance	August 11, 2007	005
Supplemental Information including GHGs calculations	October 26, 2011	

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NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	651-296-6300
Outside Metro Area	1-800-657-3864
TTY	651-282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

Brown Printing (Facility) is a commercial printing facility. The Facility consists of heatset web offset printing presses, dryers, and pollution control equipment. The Facility also has several activities that qualify as insignificant activities under Minn. R. 7007.1300, subp. 3 (see Appendix II of the permit for a list).

In 1999, the Facility took permit limits to avoid major source classification for New Source Review (40 CFR § 52.21) and the National Emissions Standards for Hazardous Air Pollutants program (40 CFR pt. 63). These limits are carried forward into this permit. The Facility is a major source under the federal operating permits program (40 CFR pt. 70). By virtue of federally enforceable operating conditions, the facility is a non major source under the federal Prevention of Significant Deterioration (PSD, 40 CFR § 52.21) program.

The permit contains requirements that limit emissions of Volatile Organic Compounds (VOC), Hazardous Air Pollutants (HAP), and combustion pollutants.

REISSUANCE DESCRIPTION:

Permit action (PER 005) is a reissuance for the Title V total facility operating permit at the Waseca Division Facility of Brown Printing Company.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-1 01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item: Total Facility

What to do	Why to do it
This permit establishes limits on the facility to keep it a minor source under the New Source Review and the NESHAP program. The Permittee cannot make any change at the source that would make the source a major source under New Source Review or the NESHAP program until a permit amendment has been issued. This includes changes that might otherwise qualify as insignificant modifications and minor or moderate amendments.	Title I Condition: Limit to avoid classification as major source modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; to avoid major source classification under 40 CFR Section 63.2
Equipment Labeling: The Permittee shall permanently affix a unique number to each emissions unit for tracking purposes. The numbers shall correlate the unit to the appropriate EU and GP numbers used in this permit. The number can be affixed by placard, stencil, or other means. The number shall be maintained so that it is readable and visible at all times from a safe distance. If equipment is added, it shall be given a new unique number; numbers from replaced or removed equipment shall not be reused.	Minn. R. 7007.0800, subp. 2
The Permittee shall maintain a written list of all fuel burning equipment on site (including both the fuel burning significant and insignificant equipment). The Permittee shall update the list to include any replaced, modified, or new equipment prior to making the change. The list shall include the capacity of each piece of equipment and the total facility capacity.	Minn. R. 7007.0800, subps. 4 & 5
STANDARD REQUIREMENTS	hdr
The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subp. 7(A), 7(L), & 7(M); Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment and practices, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-2** 01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A and/or B.	Minn. R. ch. 7017
Performance Test Notifications and Submittals: Performance Tests are due as outlined in Table A of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.	Minn. R. 7017.2018; Minn. R. 7017.2030, subps. 1-4, Minn. R. 7017.2035, subps. 1-2
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as stated in the MPCA's Notice of Compliance letter granting preliminary approval. Preliminary approval is based on formal review of a subsequent performance test on the same unit as specified by Minn. R. 7017.2025, subp. 3. The limit is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7017.2025, subp. 3
MONITORING REQUIREMENTS	hdr
Monitoring Equipment Calibration: The Permittee shall calibrate all required monitoring equipment at least once every 12 months (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A and/or B, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
RECORDKEEPING	hdr
Recordkeeping: Retain all records at the stationary source, unless otherwise specified within this permit, for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
If the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. For expiring permits, these records shall be kept for a period of five years from the date the change was made or until permit reissuance, whichever is longer. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format.	Minn. R. 7007.1200, subp. 4
REPORTING/SUBMITTALS	hdr
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-3**

01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emissions Inventory Report: due on or before April 1 of each calendar year following permit issuance. To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-4**

01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Subject Item: GP 001 Press Limits

Associated Items: CE 009 Regenerative Thermal Oxidizer
 CE 010 Regenerative Thermal Oxidizer
 CE 014 Regenerative Thermal Oxidizer
 EU 001 Web Offset Press / Dryer 1221
 EU 002 Web Offset Press / Dryer 1219
 EU 004 Web Offset Press / Dryer 1212
 EU 006 Web Offset Press / Dryer 1214
 EU 007 Web Offset Press / Dryer 1222
 EU 008 Web Offset Press / Dryer 1216
 EU 009 Web Offset Press / Dryer 1217
 EU 010 Web Offset Press / Dryer 1218
 EU 021 Press Room "Fugitives"
 EU 022 Bindery "Fugitives"
 EU 023 Prep Area "Fugitives"
 EU 024 Web Offset Press / Dryer 1220
 EU 027 Web Offset Press / Dryer 1223
 EU 028 Web Offset Press / Dryer 1224
 EU 029 Web Offset Press / Dryer 1225
 SV 017 Regenerative Thermal Oxidizer
 SV 018 Regenerative Thermal Oxidizer
 SV 021 Regenerative Thermal Oxidizer

What to do	Why to do it
A. LIMITS	hdr
<p>Volatile Organic Compounds: less than or equal to 232.50 tons/year using 12-month Rolling Sum to be calculated, by the 15th day of each month, for the previous 12-month period as described in Appendix I. This includes all non-combustion VOC emissions including from all inks, pressrooms, prep areas, and bindery chemicals.</p> <p>All emission units included in or added to GP 001 as allowed in this permit shall be included in this calculation. VOC contents for each VOC-containing material shall be determined as described under the Material Content requirement in GP 001. The calculation of VOCs used may take into account recovered/recycled VOCs as described under the Waste Credit requirement in GP 001.</p>	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
<p>HAPs - Total: less than or equal to 22.10 tons/year using 12-month Rolling Sum to be calculated, by the 15th day of each month, for the previous 12-month period as described in Appendix I. This includes all non-combustion HAP emissions including from all inks, pressrooms, prep areas, and bindery chemicals.</p> <p>All emission units included in or added to GP 001 as allowed in this permit shall be included in this calculation. HAP contents for each HAP-containing material shall be determined as described under the Material Content requirement in GP 001. The calculation of HAPs used may take into account recovered/recycled HAPs as described under the Waste Credit requirement in GP 001.</p>	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 63.2
<p>HAP-Single: less than or equal to 9.00 tons/year using 12-month Rolling Sum to be calculated, by the 15th day of each month, for the previous 12-month period. This includes all non-combustion HAP emissions including from all inks, pressrooms, prep areas, and bindery chemicals.</p> <p>All emission units included in or added to GP 001 as allowed in this permit shall be included in this calculation. HAP contents for each HAP-containing material shall be determined as described under the Material Content requirement in GP 001. The calculation of HAP usage may take into account recovered/recycled HAPs as described under the Waste Credit requirement in GP 001.</p>	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 63.2

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-5 01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

VOC and HAP PreCaps: If the Permittee replaces any non-combustion VOC or HAP- emitting equipment, adds new non-combustion VOC or HAP-emitting equipment, or modifies the existing equipment listed in GP 001, such equipment is subject to the above permit limits as well as all of the requirements of GP 001. Prior to making such a change, the Permittee shall apply for and obtain the appropriate permit amendment, as applicable. For changes described in this item, the Permittee is not required to repeat VOC calculations described in Minn. R. 7007.1200, subp. 2. A permit amendment will still be needed regardless of the emission increase if the change will be subject to a new applicable requirement or requires revision to the limits or monitoring and recordkeeping in this permit.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; to avoid major source classification under 40 CFR Section 63.2
The Permittee shall control the emissions from the Press operations (presses and dryers) including modified or new press operations with control devices meeting the requirements of GP 004, at all times that the given press is operating.	Title I Condition: Limit to avoid major source or modification under 40 CFR Section 52.21 and 40 CFR Section 63.2
B. MONITORING	hdr
Material Usage Recordkeeping: Ink materials used at the presses: On each day of operation, the Permittee shall calculate, record and maintain the quantity of each ink material delivered to the facility. This shall be based on written logs of order/delivery records. Ink is considered used on the day it is ordered/delivery. Fountain solution, automatic blanket wash, and manual blanket wash: The Permittee shall calculate, record and maintain the amount and type of solvent material. This shall be based on usage logs generated at the time material is taken out of inventory. Other VOC and HAP-containing materials: The Permittee shall calculate, record, and maintain monthly usage records showing the quantity of each material used. This shall be based on either written usage logs and/or purchase records. This includes VOC and HAP generates from Press room, Bindery, and Prep Area "Fugitives" (EU 021, EU 022, and EU 023 respectively).	Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21; Minn. R. 7007.3000; To avoid major source classification under 40 CFR Section 63.2; Minn. R. 7007.0800, subps. 4 and 5
Monthly Recordkeeping -- VOC Emissions By the 15th day of each month, the Permittee shall calculate and record the following for the previous month: 1) The total usage of VOC-containing materials for the previous calendar month using the daily and monthly usage, purchase inventory, and/or delivery records. This record shall also include the VOC content of each material as determined by the Material Content requirement of this permit; 2) The VOC emissions for the previous month using the formulas specified in this permit; and 3) The 12-month rolling sum VOC emissions for the previous 12-month period by summing the monthly VOC emissions data for the previous 12 months.	Minn. R. 7007.0800, subps. 4 and 5
Monthly Recordkeeping - HAP Emissions. By the 15th day of the month, the Permittee shall calculate and record the following using the formulas specified in this permit for the previous month: 1) The total HAP-containing materials used in the previous calendar month using the daily purchase, and/or delivery records. This record shall also include the individual and total HAP contents of each HAP-containing material used in the previous month, as determined by the Material Content requirement of this permit; 2) The total and individual HAP emissions for the previous month using the formulas specified in this permit; and 3) The 12-month rolling sum total and individual HAP emissions for the previous 12-month period by summing the monthly emissions data for the previous 12 months.	Minn. R. 7007.0800, subps. 4 and 5
Material Content: VOC and HAPs contents in materials shall be determined by either: 1. a Material Safety Data Sheet (MSDS); or 2. a Letter of Certification, provided by the supplier for each material used. If a material content range is given, the highest number in the range shall be used in all compliance calculations. Other alternative methods approved by the MPCA may be used to determine the VOC and HAPs contents. The Commissioner reserves the right to require the Permittee to determine the VOC and/or HAP contents of any material, according to EPA or ASTM reference methods. If an EPA or ASTM reference method is used for material content determination, the data obtained shall supersede the MSDS.	Minn. R. 7007.0800, subps. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-6**

01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Maximum Contents of Materials: The Permittee assumed certain worst-case contents of materials when determining the short term potential to emit of units in GP001. These assumptions are listed in Appendix VI of this permit. Changes to a material that has a higher content of any of the given pollutants is considered a change in method of operation that must be evaluated under Minn. R. 7007.1200, subp. 3 to determine if a permit amendment or notification is required under Minn. R. 7007.1150.	Minn. R. 7005.0100, subp. 35a
Waste Credit: If the Permittee elects to obtain credit for HAPs and/or VOC shipped in waste materials, the Permittee shall either use item 1 or 2 to determine the VOC and/or total and individual HAP content for each credited shipment. 1) The Permittee shall analyze a composite sample of each waste shipment to determine the weight content of VOC, total HAP, and each individual HAP, excluding water. 2) The Permittee may use supplier data for raw materials to determine the VOC and total and individual HAP contents of each waste shipment, using the same content data used to determine the content of raw materials. If the waste contains several materials, the content of mixed waste shall be assumed to be the lowest VOC and total and individual HAP content of any of the materials.	Minn. R. 7007.0800, subps. 4 and 5
Recordkeeping of Changes: Prior to making any change pertaining to the web offset presses, the Permittee shall document that the proposed change meets the criteria listed in this permit. This document shall include, at a minimum, 1) the new press is a web offset heat press; 2) the VOC and HAP emissions can be calculated in Appendix I; 3) VOC and HAPs limits will not be exceeded; and 4) the unit will be controlled as specified in GP 001. The Permittee shall maintain this documentation on-site.	Minn. R. 7007.0800, subps. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-7**

01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Subject Item: GP 002 Combustion Sources and GHG limits

Associated Items:

- EU 001 Web Offset Press / Dryer 1221
- EU 002 Web Offset Press / Dryer 1219
- EU 004 Web Offset Press / Dryer 1212
- EU 006 Web Offset Press / Dryer 1214
- EU 007 Web Offset Press / Dryer 1222
- EU 008 Web Offset Press / Dryer 1216
- EU 009 Web Offset Press / Dryer 1217
- EU 010 Web Offset Press / Dryer 1218
- EU 019 Boiler A
- EU 020 Boiler B
- EU 024 Web Offset Press / Dryer 1220
- EU 026 Chiller Unit
- EU 027 Web Offset Press / Dryer 1223
- EU 028 Web Offset Press / Dryer 1224
- EU 029 Web Offset Press / Dryer 1225
- EU 030 Boiler C
- EU 031 Regenerative Thermal Oxidizer (RTO) #1 (CE-009)
- EU 032 Regenerative Thermal Oxidizer (RTO) #2 (CE-010)
- EU 033 Boiler D
- EU 035 Regenerative Thermal Oxidizer (RTO) #3 (CE 014)
- EU 076 Diesel Engine
- EU 078 Water Tube Boiler 3
- EU 079 Make-up air-501 on M-530
- EU 080 Unit Heater - Baler room

What to do	Why to do it
FUEL USAGE LIMIT	hdr
Fuel Usage: less than or equal to 1290.4 million cubic feet/year using 12-month Rolling Sum . This limit is applied to all fuel burning insignificant activities at the facility and when natural gas is used as fuel.	Title I Condition: Limit to avoid classification as major source modification under 40 CFR pt. 70; Minn. R. 7007.1141
Fuel Usage: less than or equal to 210,000 gallons/year using 12-month Rolling Sum . This limit is applied to all burning insignificant activities at the facility and when LPG is used as fuel.	Title I Condition: Limit to avoid classification as major source modification under 40 CFR pt. 70; Minn. R. 7007.1141
<p>If the Permittee replaces any existing combustion equipment, adds new combustion equipment, or modifies the existing combustion equipment, such equipment is subject to the fuel usage limit of GP 002, the fuel type limit at each group or emission unit level, as well as the applicable requirement listed here for the appropriate type of equipment:</p> <ol style="list-style-type: none"> 1) GP 001 Presses/Dryers, 2) GP 003 Direct Heating Equipments, 3) GP 004 RTOs, 4) GP 006 Indirect Heating Equipments, and 5) EU 076 Diesel engine. <p>Prior to making such a change, the Permittee shall apply for and obtain the appropriate permit amendment, as applicable. A permit amendment will still be needed regardless of the emission increase if the change will be subject to a new applicable requirement or requires revisions to the limits or monitoring and recordkeeping in this permit.</p>	Title I Condition: Limit to avoid classification as major source modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; to avoid major source classification under 40 CFR Section 63.2
RECORDKEEPING	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Brown Printing Co - Waseca Division
Permit Number: 16100013 - 005

The Permittee must calculate and maintain records of a 12-month rolling sum of the Natural Gas and LPG usage by the 15th day of each month by summing the monthly fuel usage records from the previous 12 months.	Title I Condition: Limit to avoid classification as major source modification under 40 CFR Section 52.21; Minn. R. 7007.3000; To avoid major source classification under 40 CFR Section 63.2; Minn. R. 7007.0800, subps. 4 and 5
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TABLE A: LIMITS AND OTHER REQUIREMENTS**A-9**

01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Subject Item: GP 003 Direct Heating Equipment

Associated Items: CE 009 Regenerative Thermal Oxidizer
 CE 010 Regenerative Thermal Oxidizer
 CE 014 Regenerative Thermal Oxidizer
 EU 001 Web Offset Press / Dryer 1221
 EU 002 Web Offset Press / Dryer 1219
 EU 004 Web Offset Press / Dryer 1212
 EU 006 Web Offset Press / Dryer 1214
 EU 007 Web Offset Press / Dryer 1222
 EU 008 Web Offset Press / Dryer 1216
 EU 009 Web Offset Press / Dryer 1217
 EU 010 Web Offset Press / Dryer 1218
 EU 024 Web Offset Press / Dryer 1220
 EU 027 Web Offset Press / Dryer 1223
 EU 028 Web Offset Press / Dryer 1224
 EU 029 Web Offset Press / Dryer 1225
 EU 079 Make-up air-501 on M-530
 EU 080 Unit Heater - Baler room

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0730. This applies separately to each piece of equipment listed in this group (GP 003).	Minn. R. 7011.0610, subp. 1(A)(1)
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. This applies separately to each piece of equipment listed in this group (GP 003).	Minn. R. 7011.0610, subp. 1(A)(2)
Fuel Type: Natural gas or liquified propane gas (LPG) only.	Title I Condition: To avoid classification as a major source or modification under 40 CFR 52.21, Minn. R. 7007.3000, and Minn. R. 7005.0100, subp. 35a
The Permittee shall keep records of fuel purchase for the facility on a monthly basis.	Minn. R. 7007.0800, subps. 4 & 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-10** 01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Subject Item: GP 004 Regenerative Thermal Oxidizers**Associated Items:** CE 009 Regenerative Thermal Oxidizer

CE 010 Regenerative Thermal Oxidizer

CE 014 Regenerative Thermal Oxidizer

What to do	Why to do it
These requirements apply individually to each control device listed in GP 004 (i.e., CE 009, CE 010, and CE 014).	hdr
VOC PreCaps: If the Permittee replaces any Regenerative Thermal Oxidizer (RTO), adds a new RTO, or modifies the existing RTO listed in GP 004, such equipment is subject to the permit limits as well as all of the requirements of GP 004. Prior to making such a change, the Permittee shall apply for and obtain the appropriate permit amendment, as applicable. For changes described in this item, the Permittee is not required to repeat VOC calculations described in Minn. R. 7007.1200, subp. 2. A permit amendment will still be needed regardless of the emission increase if the change will be subject to a new applicable requirement or requires revision to the limits or monitoring and recordkeeping in this permit.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the regenerative thermal oxidizer - RTO (CE 009, CE 010, and CE 014) at all times that any emission unit controlled by the RTO (GP 001) is in operation. The Permittee shall document periods of non-operation of the control equipment.	Title I Condition: To avoid classification as a major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain the thermal oxidizer in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
Fuel Type: Natural gas or liquified propane gas (LPG) only.	Title I Condition: To avoid classification as a major source or modification under 40 CFR 52.21, Minn. R. 7007.3000, and Minn. R. 7005.0100, subp. 35a
The Permittee shall keep records of fuel purchases for the facility on a monthly basis.	Minn. R. 7007.0800, subps. 4 & 5
LIMITS	hdr
The Permittee shall operate and maintain the control equipment such that it achieves a destruction efficiency for Volatile Organic Compounds: greater than or equal to 97 percent control efficiency	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21, Minn. R. 7007.300, and 40 CFR Section 63.2
The Permittee shall operate and maintain the control equipment such that it achieves a destruction efficiency for HAPs - Volatile: greater than or equal to 97 percent control efficiency	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21, Minn. R. 7007.3000, and 40 CFR Section 63.2
The Permittee shall operate and maintain the appropriate number of regenerative thermal oxidizer(s) as outlined in the condition below, any time that any process equipment controlled by the regenerative thermal oxidizer(s) is in operation.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21, Minn. R. 7007.3000, and 40 CFR Section 63.2
Each regenerative thermal oxidizer (CE 009, CE 010, and CE 014) shall be in operation for Web Offset Presses with an adjustable intake flow rate. During normal production or backup mode operations, either the CE 009, CE 010, or CE 014 maximum intake flow rate shall not exceed 25,000 SCFM. For example, the sum of the individual press exhaust flow rates into CE 009 cannot exceed the CE 009 design intake flow of 25,000 SCFM. The individual press design flow rates are found in Appendix IV of the additional Appendix material.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21, Minn. R. 7007.3000, and 40 CFR Section 63.2
Temperature: greater than or equal to 1575.0 degrees F using 3-hour Rolling Average at the combustion chamber outlet, unless a new limit is required to be set pursuant to Minn. R. 7017.2025, subp. 3. If a new minimum is required to be set it will be based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated. The new limit shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. This limit is final upon issuance of a permit amendment incorporating the change. If the 3-hour rolling average temperature is below the minimum temperature limit, the VOC emitted during that time shall be considered uncontrolled until the average temperature is above the minimum temperature limit. This shall be reported as a deviation.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 and 40 CFR Section 63.2
PERFORMANCE TESTING	hdr
Performance Test: due before end of each 60 months starting 10/28/2008 for VOC destruction efficiency of each RTO (CE 009, CE 010, and CE 014). The next due date for this performance test will be 10/28/2013.	Minn. R. 7017.2020, subp. 1
MONITORING	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-11** 01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Temperature Monitoring: The Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records the combustion chamber temperature of the thermal oxidizer. The monitoring device shall have a margin of error less than the greater of +/- 0.75 percent of the temperature being measured or +/- 2.5 degrees Celsius. The recording device shall also calculate the three-hour rolling average combustion chamber temperature. Recorded values outside the range specified in this permit are considered Deviations as defined by Minn. R. 7007.0100, subp. 8a.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21, Minn. R. 7007.3000; 40 CFR Section 64.3(b)(4)(ii); Minn. R. 7017.0200
The Permittee shall maintain a minimum retention time, as provided by the manufacturer, in each regenerative thermal oxidizer that is controlling press operations. The manufacturer's warranty parameters are found in Appendix V of the additional Appendix material.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21, Minn. R. 7007.3000 and 40 CFR Section 63.2; 40 CFR Section 64.3(b); Minn. R. 7017.0200
Daily Monitoring: The Permittee shall physically verify the operation of the temperature recording device at least once each operating day to verify that it is working and recording properly. The Permittee shall maintain a written record of the daily verifications.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21; Minn. R. 7007.3000 and 40 CFR Section 63.2; Minn. R. 7007.0800 subp. 4 and 5; 40 CFR Section 64.3(b)(4)(ii); Minn. R. 7017.0200
Monitoring Equipment: The Permittee shall install and maintain thermocouples to conduct temperature monitoring required by this permit. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.	40 CFR Section 64.7(b); Minn. R. 7017.0200; Minn. R. 7007.0800, subp. 4
The Permittee shall maintain a continuous hard copy readout or computer disk file of the temperature readings of each thermal oxidizer during oxidizer operation for the combustion chamber. Measurements shall be taken no less frequently than once every fifteen minutes. Measurements taken during each hour shall be averaged to determine the 1-hour average temperature. Once each hour, the Permittee shall take the average of the previous three 1-hour temperature averages to determine the 3-hour rolling average temperature.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 and 5; 40 CFR Section 64.9(b); Minn. R. 7017.0200
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment internal and external system components, including but not limited to the refractory, heat exchanger, and electrical systems. The Permittee shall maintain a written record of the quarterly, semi-annual, and annual inspections and any corrective actions taken resulting from the inspection.	40 CFR Section 64.3; Minn. R. 7017.0200
Annual Inspection: At least once per calendar year, the Permittee shall conduct an internal inspection of the control device that includes all operating systems of the control device. The Permittee shall maintain a written record of the inspection and any action resulting from the inspection.	40 CFR Section 64.3; Minn. R. 7017.0200
Annual Calibration: The Permittee shall calibrate the temperature monitor at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	40 CFR Section 64.7(b); Minn. R. 7017.0200; Minn. R. 7007.0800, subps. 4, 5, and 14
For periods when the regenerative thermal oxidizer is operated above the minimum combustion chamber temperature, the Permittee shall use either one of the following when completing calculations as required elsewhere in this permit: a. The overall control efficiency limit specified in this permit for this equipment (97%); or b. The overall control efficiency determined during the most recent MPCA approved performance test. If the tested efficiency is less than the efficiency limit in this permit, the Permittee must use the tested value in all calculations until the efficiency is demonstrated to be above the permit limit through a new test.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 and 40 CFR Section 63.2; Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 and 5
Corrective Actions: If the temperature is below the minimum specified by this permit or if the regenerative thermal oxidizer or any of its components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the temperature to at least the permitted minimum and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the regenerative thermal oxidizer. The Permittee shall keep a record of the type and date of any corrective action taken.	40 CFR Section 64.7(d); Minn. R. 7017.0200
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing minimum combustion chamber temperature(s), the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring changes.	40 CFR Section 64.7(e); Minn. R. 7017.0200

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-12**

01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200
The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	40 CFR Section 64.9(b); Minn. R. 7017.0200

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-13**

01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Subject Item: GP 006 Indirect Heating Equipment**Associated Items:** EU 019 Boiler A

EU 020 Boiler B

EU 030 Boiler C

EU 033 Boiler D

EU 078 Water Tube Boiler 3

SV 009 Boiler A

SV 010 Boiler B

SV 016 Boiler D

SV 019 Boiler C

What to do	Why to do it
These requirements apply individually to each boiler listed in GP 006 (i.e., EU 019, EU 020, EU 030, EU 033, and EU 078).	hdr
Total Particulate Matter: less than or equal to 0.40 lbs/million Btu heat input . (Note: design based PTE is 0.0006 lbs PM / million Btu heat input).	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Fuel Type: Natural gas or liquified propane gas (LPG) only.	Title I Condition: To avoid classification as a major source or modification under 40 CFR 52.21, Minn. R. 7007.3000, and Minn. R. 7005.0100, subp. 35a
The Permittee shall keep records of fuel purchases for the facility on a monthly basis.	Minn. R. 7007.0800, subps. 4 & 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-14** 01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Subject Item: GP 008 Paper Waste Recycling Fabric Filters (no CAM)**Associated Items:** CE 006 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 007 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 011 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 017 Paper Waste Recycling System

EU 018 Paper Waste Recycling System

What to do	Why to do it
These requirements apply to each piece of control equipment individually.	hdr
EMISSION AND OPERATIONAL LIMITS	hdr
Total Particulate Matter: greater than or equal to 99 percent control efficiency .	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7011.0070, subp. 1(A)
Total Particulate Matter: less than or equal to 0.010 grains/dry standard cubic foot of exhaust gas. This limit comes from fabric filter manufacturer which satisfies Minn. R. 7011.0715, subp. 1(A) limit of 0.30 grains/dry standard cubic foot of exhaust gas.	Minn. R. 7007.0800, subp. 2 (This also satisfies Minn. R. 7011.0715, subp. 1(A))
PM < 10 micron: greater than or equal to 93 percent control efficiency .	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
PM < 10 micron: less than or equal to 0.010 grains/dry standard cubic foot of exhaust gas.	Minn. R. 7007.0800, subp. 2
PM < 2.5 micron: greater than or equal to 93.0 percent control efficiency	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the fabric filter at all times that any process equipment controlled by the fabric filter is operating. The Permittee shall document periods of non-operation of the control equipment.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Visible Emissions: The Permittee shall check the fabric filter stacks (SV 007, SV 008, and SV 020) for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across each fabric filter, once each day of operation (while venting externally).	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 & 5
Pressure Drop: greater than or equal to 0.50 inches of water column and less than or equal to 6.00 inches of water column as determined using manufacturer information, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. During inclement weather, the Permittee shall record the pressure drop at least once every 24 hours when in operation.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Recordkeeping of Pressure Drop during inclement weather: The Permittee shall record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subps. 4, 5 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-15**

01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

<p>Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur:</p> <ul style="list-style-type: none">-visible emissions are observed,- the recorded pressure drop is outside the required operating range; or- the fabric filter or any of its components are found during the inspections to need repair. <p>Corrective actions shall return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.</p>	Minn. R. 7007.0800, subp. 4, 5, and 14
<p>The Permittee shall operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.</p>	Minn. R. 7007.0800, subp. 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-16** 01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Subject Item: GP 009 Paper Waste Recycling Fabric Filters (CAM)**Associated Items:** CE 012 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 013 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 034 Paper Waste Recycling System

EU 043 Paper Waste Recycling

EU 044 Paper Waste Recycling

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
The Permittee shall operate and maintain the fabric filters in this group (GP 009) at all times that any emission unit controlled by the fabric filter is in operation. The Permittee shall document periods of non-operation of the control equipments.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14
Total Particulate Matter: less than or equal to 0.010 grains/dry standard cubic foot of exhaust gas. This limit comes from fabric filter manufacturer which satisfies Minn. R. 7011.0715, subp. 1(A) limit of 0.30 grains/dry standard cubic foot of exhaust gas.	Minn. R. 7007.0800, subp. 2 (This also satisfies Minn. R. 7011.0715, subp. 1(A))
PM < 10 micron: greater than or equal to 0.010 grains/dry standard cubic foot of exhaust gas.	Minn. R. 7007.0800, subp. 2
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron: greater than or equal to 93.0 percent control efficiency	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron: greater than or equal to 93.0 percent control efficiency	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0 percent control efficiency	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14
Pressure Drop: greater than or equal to 1 inches of water column and less than or equal to 12 inches of water column , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14
MONITORING AND RECORDKEEPING	hdr
Daily Inspections: The Permittee shall do the following, once every 24 hours: 1). Inspect the fabric filter stacks (SV 020, SV 026 and SV 027) for any visible emissions during daylight hours, except during inclement weather. 2). During inclement weather, read and record the pressure drop across the fabric filter.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14; 40 CFR Section 64.3; Minn. R. 7017.0200
Recordkeeping of Visible Emissions and Pressure Drop: The Permittee shall record the time and date of each visible emission inspection and pressure drop reading, and whether or not any visible emissions were observed, and whether or not the observed pressure drop was within the range specified in this permit. Recorded values outside the range specified in this permit are considered Deviations as defined by Minn. R. 7007.0100, subp. 8a.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14; 40 CFR Section 64.3; Minn. R. 7017.0200
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; or - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	40 CFR Section 64.7(d); Minn. R. 7017.0200

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-17**

01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation.	40 CFR Section 64.7(b); Minn. R. 7017.0200
The Permittee shall calibrate the pressure gauge at least once every 12 months and shall maintain a written record of any action resulting from the calibration.	40 CFR Section 64.3; Minn. R. 7017.0200
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing pressure drop range, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring change.	40 CFR Section 64.7(e); Minn. R. 7017.0200
As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200
The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	40 CFR Section 64.9(b); Minn. R. 7017.0200

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-18**

01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

Subject Item: EU 076 Diesel Engine**Associated Items:** GP 002 Combustion Sources and GHG limits

SV 059 Engine Exhaust

What to do	Why to do it
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.50 lbs/million Btu heat input (The potential to emit from the unit is 0.295 lbs SO ₂ per MMBtu due to equipment design and using diesel as fuel)	Minn. R. 7011.2300, subp. 2
Fuel Type: Diesel fuel only.	Title I Condition: To avoid classification as a major source or modification under 40 CFR 52.21, Minn. R. 7007.3000, and Minn. R. 7005.0100, subp. 35a
The Permittee shall keep records of fuel purchases for the facility on a monthly basis.	Minn. R. 7007.0800, subps. 4 & 5

TABLE B: SUBMITTALS

B-1 01/29/13

Facility Name: Brown Printing Co - Waseca Division
Permit Number: 16100013 - 005

Also, where required by an applicable rule or permit condition, send to the Permit Document Coordinator notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Chief Air Enforcement
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

Fiscal Services
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

Facility Name: Brown Printing Co - Waseca Division
Permit Number: 16100013 - 005

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility

TABLE B: RECURRENT SUBMITTALS**B-3** 01/29/13

Facility Name: Brown Printing Co - Waseca Division

Permit Number: 16100013 - 005

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 01/23/2003. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Annual Report	due 30 days after end of each calendar year following Permit Issuance. The Permittee shall submit an annual report by January 31 that describes the changes made at the facility during the previous calendar year using the latest MPCA application forms. The report shall document: 1) the VOC and HAP 12-month rolling sum calculations for the previous calendar year and 2) 12-month rolling sum fuel usage limits. The report shall be submitted with the annual Compliance Certification listed in Table B. As part of the Annual Report, the Permittee shall verify and certify that the facility has maintained minor source status for New Source Review and Part 63.	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 01/13/2003 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility