



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 21 2008

REPLY TO THE ATTENTION OF:
AE-17J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Raymond R. Krueger, Esq
Michael Best & Friedrich
100 East Wisconsin Avenue, Suite 3300
Milwaukee, Wisconsin 553202-4108

Dear Mr. Krueger:

Enclosed is a file-stamped Consent Agreement and Final Order (CAFO) which resolves Journal Holdings, Inc., f/k/a Northstar Print Group, Inc., CAA Docket No. ~~CAA-05-2008-0028~~. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on JUL 21 2008.

Pursuant to paragraph 62 of the CAFO, Journal Holdings, Inc., must pay the civil penalty within 30 days of JUL 21 2008. Your check must display the case docket number, ~~CAA-05-2008-0028~~, and the billing document number, 2750803A024.

Please direct any questions regarding this case to Eaton Weiler, Associate Regional Counsel, (312) 886-6041.

Sincerely,

Bonnie Bush, Chief
Air Enforcement and Compliance Assurance
Section (MI/WI)

Enclosure

cc: Thomas Hess, Enforcement Unit Chief
Michigan Department of Environmental Quality

Brian Brady, Supervisor
Upper Peninsula District Office

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	
)	CAA-05-2008-0028
Journal Holdings, Inc.)	Docket No.
Milwaukee, Wisconsin,)	Proceeding to Assess a Civil Penalty
)	Under Section 113(d) of the Clean Air
Respondent.)	Act, 42 U.S.C. § 7413(d)
_____)	

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 113(d) of the Clean Air Act (CAA or the Act), 42 U.S.C. § 7413(d), and Sections 22.1(a)(2), 22.13(b), and 22.18(b)(2) and (3) of the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits* (Consolidated Rules), as codified at 40 C.F.R. Part 22.
2. Complainant is the Acting Director of the Air and Radiation Division, U. S. Environmental Protection Agency, Region 5.
3. Respondent is Journal Holdings, Inc., f/k/a NorthStar Print Group, Inc., a business incorporated in and doing business in the State of Wisconsin.
4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).
5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.
6. Respondent consents to entry of this CAFO and the assessment of the specified civil

penalty, and agrees to comply with the terms of the CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO set forth at paragraphs 1 – 6 and 9 – 11, and neither admits nor denies the factual allegations and alleged violations set forth in paragraphs 37 – 59. Nothing in this CAFO shall be construed as an admission of liability by Respondent in any other proceeding now pending or hereafter commenced.

8. For the purposes of this CAFO, Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO pursuant to the procedures set forth in 40 C.F.R. §§ 22.1-22.32 and 22.34, and its right to appeal this CAFO pursuant to 40 C.F.R. Part 22, Subpart F.

Statutory and Regulatory Background

9. For violations that occurred within one year prior to initiation of the administrative action, the Administrator of EPA (the Administrator) may assess a civil penalty of up to \$27,500 per day of violation up to a total of \$220,000 for violations that occurred from January 31, 1997, through March 15, 2004, and may assess a civil penalty of up to \$32,500 per day of violation up to a total of \$270,000 for violations that occurred after March 15, 2004. Section 113(d)(1) of the CAA, 42 U.S.C. § 7413(d)(1), and 40 C.F.R. Part 19.

10. The Administrator may assess a penalty greater than \$270,000 and for a period longer than one year where the Administrator and the Attorney General of the United States jointly determine that a matter involving a larger penalty is appropriate for an administrative penalty action. Section 113(d)(1) of the CAA, 42 U.S.C. § 7413(d)(1) and 40 C.F.R. Part 19.

11. The Administrator and the Attorney General of the United States, each through their

respective delegates, have determined jointly that a penalty greater than \$270,000 and for a period longer than one year is appropriate for an administrative penalty action for the violations alleged in this matter.

Printing and Publishing NESHAP

12. Under Section 112 of the CAA, 42 U.S.C. §§ 7412, on May 30, 1996, EPA promulgated the National Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry (Printing and Publishing NESHAP) at 40 C.F.R. Part 63, Subpart KK, §§ 63.820 through 63.831. 61 *Fed. Reg.* 27140.

13. The Printing and Publishing NESHAP, as relevant, applies to the owner or operator of an existing facility that operates a product and packaging rotogravure printing press, and that is a major source of hazardous air pollutants (HAPs). 40 C.F.R. § 63.820(a).

14. The compliance date for an existing source subject to the Printing and Publishing NESHAP was May 30, 1999. 40 C.F.R. § 63.826.

15. "Product and packaging rotogravure printing" means the production, on a rotogravure press, of any printed substrate not otherwise defined as publication rotogravure printing. This includes, but is not limited to, folding cartons, flexible packaging, labels and wrappers, gift wraps, wall and floor coverings, upholstery, decorative laminates, and tissue products. 40 C.F.R. § 63.822.

16. The term "major source" means, in relevant part, any stationary source which directly emits or has the potential to emit 10 tons per year or more of any single HAP. Section 112(a)(1) of the CAA, 42 U.S.C. § 7412(a)(1).

17. The term "hazardous air pollutant" includes toluene. Sections 112(a)(6) and (b)(1) of the CAA, 42 U.S.C. §§ 7412(a)(6) and (b)(1).

18. The Printing and Publishing NESHAP requires, as relevant, the owner or operator of a product and packaging rotogravure printing press (or group of printing presses) to operate a capture system and control device, and limit the organic HAP emission rate to no more than 0.20 kilograms of organic HAPs emitted per kilogram solids applied as determined on a monthly average as-applied basis. 40 C.F.R. § 63.825(b)(8).

19. The Printing and Publishing NESHAP requires, as relevant, the owner or operator of a product and packaging printing press (or group of presses) using a thermal oxidizer as a control device to conduct a performance test to determine the destruction efficiency of each thermal oxidizer and the associated minimum combustion zone temperature to ensure that the determined destruction efficiency is maintained. 40 C.F.R. §§ 63.825(d), 63.825(f), and 63.827(d).

20. The Printing and Publishing NESHAP requires, as relevant, the owner or operator of a product and packaging printing press (or group of presses), using thermal oxidizers to comply with the organic HAP emissions limit, to develop a written startup, shutdown, and malfunction plan for the thermal oxidizers, including *inter alia*, the requirement to operate and maintain the thermal oxidizers in a manner which satisfies the general duty to minimize emissions at all times. 40 C.F.R. § 63.823 and 40 C.F.R. § 63.6(e)(3).

21. The product and packaging printing press (or group of presses) is in compliance for the month if, as relevant, the owner or operator monitors the combustion zone temperature of each thermal oxidizer, and determines and records whether that temperature is maintained at or above the temperature established during the performance test conducted to determine the destruction efficiency. 40 C.F.R. §§ 63.825(f), 63.828(a)(4), 63.828(b), and 63.829(b).

22. The Printing and Publishing NESHAP requires, as relevant, the owner or operator of a product and packaging printing press (or group of presses) using a capture system to conduct a

performance test to determine the capture efficiency of each capture system, and the associated operating parameter value (or range of values) to ensure that the determined capture efficiency is maintained. 40 C.F.R. §§ 63.825(d), 63.825(f), and 63.827(e), and 63.828(a)(5).

23. The product and packaging printing press (or group of presses) is in compliance for the month if, as relevant, the owner or operator monitors the capture efficiency operating parameter of each capture system, and determines and records whether that operating parameter is maintained within the levels established during the performance test conducted to determine the capture efficiency. 40 C.F.R. §§ 63.825(f), 63.828(a)(5), 63.828(b), and 63.829(b).

24. The determined destruction efficiency of each thermal oxidizer and capture efficiency of each capture system are used to determine the organic HAP emissions from the press (or group of presses), and thus compliance with the emissions limit. 40 C.F.R. §§ 63.825(d) and (f).

25. The Printing and Publishing NESHAP requires owners and operators of a product and packaging printing press with intermittently-controllable work stations to, among other things: (1) install, calibrate and maintain a flow control position indicator; (2) secure any bypass line valve in the closed position with a car-seal or lock-and-key type configuration; (3) ensure that any bypass line valve or damper is in the closed position through continuous monitoring of valve position; or (4) use an automatic shutdown system in which the press is stopped when flow is diverted away from the control device to any bypass line. 40 C.F.R. § 63.828(a)(1)

26. "Intermittently-controllable work station" means a work station associated with a dryer with provisions for the dryer exhaust to be delivered to or diverted from a control device depending on the position of a valve or damper. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines. 40 C.F.R. § 63.822.

27. The Printing and Publishing NESHAP requires owners and operators of a product and packaging printing press to submit compliance reports on a semi-annual basis, including any excursions (or lack of monitoring) of any operating parameters required to be monitored, and the facility's compliance with the monthly emission limit. 40 C.F.R. §§ 63.825(f)(7) and 63.830(b)(6).

Chromium Electroplating NESHAP

28. Under Section 112 of the CAA, on January 25, 1995, EPA promulgated the National Emission Standards for Hazardous Air Pollutants for Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (Chromium Electroplating NESHAP) at 40 C.F.R. Part 63, Subpart N, §§ 63.340 through 63.348. 60 *Fed. Reg.* 4963.

29. The Chromium Electroplating NESHAP applies to, in relevant part, owners and operators of a facility that operate a chromium electroplating tank performing hard chromium electroplating. 40 C.F.R. § 63.340.

30. The compliance date for a facility that operates a hard chromium electroplating tank was January 25, 1997. 40 C.F.R. § 63.346(a)(1)(ii).

31. "Chromium electroplating tank" means the receptacle or container along with the following internal and external components needed for chromium electroplating: Rectifiers, anodes, heat exchanger equipment, circulation pumps, and air agitation systems. 40 C.F.R. § 63.341.

32. "Hard chromium electroplating" or industrial chromium electroplating means a process by which a thick layer of chromium (typically 1.3 to 760 microns) is electrodeposited on a base material to provide a surface with functional properties such as wear resistance, a low coefficient of friction, hardness, and corrosion resistance. In this process, the part serves as the

cathode in the electrolytic cell and the solution serves as the electrolyte. Hard chromium electroplating process is performed at current densities typically ranging from 1,600 to 6,500 amperes per square meter for total plating times ranging from 20 minutes to 36 hours depending upon the desired plate thickness. 40 C.F.R. § 63.341.

33. The Chromium Electroplating NESHAP requires, as relevant, an owner or operator to conduct a performance test to establish, as an operating parameter, the pressure drop across the composite mesh-pad system used to control emissions and that corresponds to compliance with the chromium emissions limit. 40 C.F.R. §§ 63.343(c)(1) and 63.344(d).

34. The facility is in compliance, as relevant, if the owner or operator monitors the pressure drop across the composite mesh-pad system on a daily basis, and determines and records whether that pressure drop is within two inches of water-column of the pressure drop established during the performance test conducted to determine compliance with the chromium emissions limit. 40 C.F.R. §§ 63.343(c)(1), 63.344(d) and 63.346(b)(8).

35. The Chromium Electroplating NESHAP requires, as relevant, an owner or operator to prepare and implement an operation and maintenance plan for the composite mesh-pad system, including: (1) at least once per quarter, visually inspecting the system to ensure that there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structure of the device; (2) at least once per quarter, visually inspecting the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist; (3) once per quarter, visually inspecting the ductwork from the tank to the control device to ensure there are no leaks; and (4) performing washdown of the composite mesh-pads in accordance with the manufacturer's recommendations. 40 C.F.R. § 63.342(f)(3)

36. The Chromium Electroplating NESHAP requires, as relevant, an owner or operator

to submit semi-annual compliance reports, including but not limited to: (1) the pressure drop range across the composite mesh-pad system that correspond to compliance with the chromium emissions limit; and (2) certification by a responsible official of the implementation of the operation and maintenance plan. 40 C.F.R. § 63.347(g)(3).

Factual Allegations and Alleged Violations

37. At all times relevant to this CAFO, Respondent owned and operated a printing facility located at 512 Ninth Avenue, Norway, Michigan (the Facility).

38. On January, 25, 2005, the predecessor in interest of Respondent (NorthStar Print Group, Inc.) and Journal Communications, Inc. entered into an Asset Purchase Agreement (APA) with Multi-Color Corporation, and two of its subsidiaries, including MCC-Norway, Inc. for the purpose of selling certain assets, including the Facility. The APA provided, inter alia, that assets located outside of Wisconsin would be purchased by MCC-Norway, Inc. Therefore, Respondent's liability for the violations alleged in this CAFO ended on January 25, 2005 (the date of the sale of the Facility to MCC-Norway, Inc. from Respondent's predecessor in interest (NorthStar Print Group, Inc.) and Journal Communications.

39. At all times relevant to this CAFO, the Facility was a major source within the meaning of Section 112(a)(1) of the CAA, 42 U.S.C. § 7412(a)(1), because it emitted or had the potential to emit 10 tons per year or more of toluene, a hazardous air pollutant.

Printing and Publishing Industry NESHAP

40. At all times relevant to this CAFO, Respondent owned and operated three product and packaging rotogravure printing presses at the Facility, identified as Press Nos. 5, 6, and 7.

41. At all times relevant to this CAFO and after May 30, 1999, the Facility was subject to the Printing and Publishing NESHAP.

42. At all times relevant to this CAFO, the emissions captured from Press Nos. 5, 6, and 7 were directed to one or both of the two thermal oxidizers at the Facility.

43. Respondent conducted a performance test in November 1995 to determine the destruction efficiency of the thermal oxidizers. However, Respondent violated 40 C.F.R. §§ 63.825(d), 63.825(f) and 63.827(d) by failing to establish the minimum combustion zone temperatures of the oxidizers to ensure that the determined destruction efficiencies were maintained, and thus determine ongoing compliance.

44. Respondent violated 40 C.F.R. § 63.823 and 40 C.F.R. § 63.6(e)(3) by failing to develop a written startup, shutdown, and malfunction plan for the thermal oxidizers that adequately documented the thermal oxidizers' operating parameters.

45. Respondent violated 40 C.F.R. §§ 63.825(f), 63.828(a)(4), 63.828(b) and 63.829(b) by failing to monitor, determine, and record whether the minimum combustion zone temperature of the thermal oxidizers was above a temperature established during a performance test to determine the destruction efficiency.

46. At all times relevant to this CAFO, Press Nos. 6 and 7 were contained within a permanent total enclosure to capture emissions from those presses while operating. Press No. 5 did not operate within a permanent total enclosure and used a hood to capture emissions from that press.

47. Respondent conducted a performance test in August 1993 to determine the capture efficiency of the hood used to capture emissions from Press No. 5. However, Respondent violated 40 C.F.R. §§ 63.825(d), 63.825(f), 63.827(e), and 63.838(a)(5) by failing to establish an operating parameter value (or range of values) to ensure that the determined capture efficiency was maintained, and thus determine ongoing compliance.

48. Respondent violated 40 C.F.R. §§ 63.825(f), 63.828(a)(5), 63.828(b), 63.829(b) by failing to monitor, determine, and record whether, for Press No. 5, the operating parameter value (or range of values) fell outside of the value (or range of values) established during a performance test to determine the capture efficiency.

49. At certain times relevant to this CAFO, Press Nos. 5, 6 and 7 contained intermittently-controllable work stations.

50. For the intermittently-controllable work stations, Respondent violated 40 C.F.R. § 63.828(a)(1) by failing to: (1) install, calibrate and maintain a flow control position indicator; (2) secure any bypass line valve in the closed position with a car-seal or lock-and-key type configuration; (3) ensure that any bypass line valve or damper is in the closed position through continuous monitoring of valve position; or (4) use an automatic shutdown system in which the press is stopped when flow is diverted away from the control device to any bypass line.

51. Respondent violated 40 C.F.R. § 63.825(f)(7) and 63.830(b)(6) by failing to submit compliance reports on a semi-annual basis, including any excursions (and failure to monitor for excursions) from the minimum combustion zone temperature of the thermal oxidizer, any excursions (and failure to monitor for excursions) from the capture efficiency operating parameter value (or range of values) of the Press No. 5 capture system, and the Facility's compliance (or non-compliance) based on the monthly emission limit.

52. Respondent violated 40 C.F.R. § 63.825(b)(8) by exceeding the monthly emission limit, for Press No. 5, 6, and 7, of 0.20 kilograms of organic HAPs emitted per kilogram of solids applied on a monthly average as-applied basis for the months of December 2003, and August and September of 2004.

Chromium Electroplating NESHAP

53. At all times relevant to this CAFO, Respondent owned and operated a chromium electroplating tank performing hard chromium electroplating.

54. At all times relevant to this CAFO and after January 25, 1997, Respondent was subject to the Chromium Electroplating NESHAP as it applies to a chromium electroplating tank performing hard chromium electroplating.

55. At all times relevant to this CAFO, Respondent operated a composite mesh-pad system to control chromium emissions from the hard chromium electroplating operation.

56. Respondent conducted a performance test in March 1997 to determine compliance with the emission limit for the hard chromium electroplating operation. However, Respondent violated 40 C.F.R. §§ 63.343(c)(1) and 63.344(d) by failing to establish, as an operating parameter, the pressure drop across the composite mesh-pad system to ensure compliance with the chromium emission limit for the hard chromium electroplating operation.

57. Respondent violated 40 C.F.R. §§ 63.343(c)(1), 63.344(d) and 63.346(b)(8) by failing to monitor, determine, and record, on a daily basis, whether the pressure drop across the composite mesh-pad system was within the range established during a performance test to determine compliance with the chromium emission limit for the hard chromium electroplating operation.

58. For some quarters relevant to this CAFO, Respondent violated 40 C.F.R. § 63.342(f)(3), by failing to implement an operation and maintenance plan for the composite mesh-pad system, including: (1) at least once per quarter, visually inspecting the system to ensure there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structure of the device; (2) at least once per quarter, visually inspecting

the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist; (3) once per quarter, visually inspecting the ductwork from the tank to the control device to ensure there are no leaks; and (4) performing washdown of the composite mesh-pads in accordance with the manufacturer's recommendations.

59. Respondent violated 40 C.F.R. § 63.347(g)(3) by failing to submit, for the composite mesh-pad system, semi-annual compliance reports, including: (1) the pressure drop range across the composite mesh-pad system that corresponds to compliance with the chromium emissions limit; and (2) certification by a responsible official of the implementation of the operation and maintenance plan.

Civil Penalty

60. Based on analysis of the factors specified in Section 113(e) of the Act, 42 U.S.C. § 7413(e), the facts of this case, and Respondent's cooperation in resolving this matter, Complainant has determined that an appropriate civil penalty to settle this action is \$200,000.

61. The facts of this case include the self-disclosure submitted by Respondent to the Michigan Department of Environmental Quality, and the related audit reports, the self-disclosure submitted by MCC-Norway, Inc. to the Complainant, the Title-V deviation reports, information provided by Respondent in response to Complainant's finding of violation, and information provided by Respondent and MCC-Norway, Inc. in response to Complainant's limited information requests.

62. Within 30 days after the effective date of this CAFO, Respondent must pay a \$200,000 civil penalty by one of the following options:

- a. Sending via U.S. Postal Service mail a cashier's or certified check payable to the "Treasurer, United States of America," to:

U.S. EPA
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

The check must note the case name, docket number of this CAFO, and the billing document number.

- b. Sending via a carrier that will not deliver to P.O. Boxes (*e.g.* express carrier) a cashier's or certified check payable to the "Treasurer, United States of America," to:

U.S. Bank
Government Lockbox 979077 U.S. EPA Fines and Penalties
1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, MO 63101

The check must note the case name, docket number of this CAFO, and the billing document number.

- c. Sending via electronic funds transfer payable to the "Treasurer, United States of America," to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
33 Liberty Street
New York, NY 10045
Field Tag 4200 of the Fedwire message should read:
"D68010727 Environmental Protection Agency"

In the comment or description field of the electronic funds transfer, state the case name, the docket number of this CAFO and the billing document number.

63. A transmittal letter stating Respondent's name, complete address, the case docket number, and the billing document number must accompany the payment. Respondent must send

copies of the payment and transmittal letter to:

Attn: Regional Hearing Clerk, (E-13J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, IL 60604;

Attn: Compliance Tracker, (AE-17J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, IL 60604; and

Eaton R. Weiler, (C-14J)
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

64. This civil penalty is not deductible for federal tax purposes.

65. If Respondent does not pay timely the civil penalty, the EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States' enforcement expenses for the collection action under Section 113(d)(5) of the Act, 42 U.S.C. § 7413(d)(5). The validity, amount, and appropriateness of the civil penalty are not reviewable in a collection action.

66. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any overdue amount from the date payment was due at a rate established by the Secretary of the Treasury. Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a nonpayment penalty each quarter during which the assessed penalty is overdue according to Section 113(d)(5) of the Act, 42 U.S.C. § 7413(d)(5). This nonpayment penalty will be 10 percent of the aggregate amount of the outstanding penalties and

nonpayment penalties accrue from the beginning of the quarter.

General Provisions

67. This CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in this CAFO.

68. The CAFO does not affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violation of law.

69. This CAFO does not affect Respondent's responsibility to comply with the Act and other applicable federal, state, and local laws. Except as provided in paragraph 67, above, compliance with this CAFO will not be a defense to any actions subsequently commenced pursuant to federal laws administered by Complainant.

70. This CAFO constitutes an "enforcement response" as that term is used in EPA's *Clean Air Act Stationary Source Civil Penalty Policy* to determine Respondent's "full compliance history" under Section 113(e) of the Act, 42 U.S.C. § 7413(e).

71. The terms of this CAFO bind Respondent, its successors, and assigns.

72. Each person signing this consent agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

73. Each party agrees to bear its own costs and attorneys' fees in this action.

74. This CAFO constitutes the entire agreement between the parties.

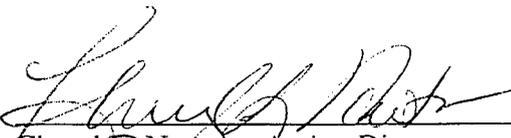
Journal Holding, Inc., Respondent

6/24/08
Date


Paul M. Bonaiuto, Executive Vice President
Journal Holdings, Inc.

United States Environmental Protection Agency, Complainant

7/10/08
Date


Cheryl L. Newton, Acting Director
Air and Radiation Division
U.S. Environmental Protection
Agency, Region 5 (A-18J)

CONSENT AGREEMENT AND FINAL ORDER

In the Matter of:

Journal Holdings, Inc.

Docket No CAA-05-2008-0028

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

7/21/08
Date

Walter W. Kovalich
for
Bharat Mathur
Acting Regional Administrator
U.S. Environmental Protection
Agency, Region 5

In the Matter of:
Journal Holdings, Inc. f/k/a Northstar Print Group, Inc.
Docket No: CAA-05-2008-0028

CERTIFICATE OF FILING AND MAILING

I, Tracy Jamison certify that I hand delivered the original of the Consent Agreement and Final Order, docket number CAA-05-2008-0028 to the Regional Hearing Clerk, Region 5, United States Environmental Protection Agency, 77 West Jackson Boulevard, Chicago, Illinois 60604; and that I mailed by Certified Mail, Return Receipt Requested, to Journal Holdings, Inc. f/k/a Northstar Print Group, Inc Counsel by placing it in the custody of the United States Postal Service addressed as follows:

Paul M. Bonaiuto
Executive Vice President
Journal Communications Inc.
333 W. State Street
Milwaukee, Wisconsin 53201

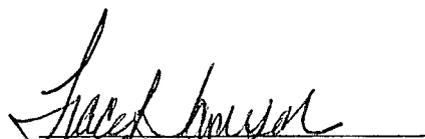
Raymond R. Krueger, Esq.
Michael Best & Friedrich
100 East Wisconsin Avenue, Suite 3300
Milwaukee, Wisconsin 53202-4108

I also certify that a copy of the CAFO was sent by First Class Mail to:

Tom Hess, Enforcement Unit Supervisor
Michigan Department of Environmental Quality
P.O. Box 30260
Lansing, Michigan 48909

Brian Brady, Supervisor
Upper Peninsula District
420 Fifth Street
Gwinn, Michigan 49841

on the 22 Day of July 2008


Tracy Jamison
Office Automation Clerk
AECAS (MI/WI)

CERTIFIED MAIL RECEIPT NUMBER: 70010320000601989178 Paul M. Bonaiuto

CERTIFIED MAIL RECEIPT NUMBER: 7001032000060185713 Raymond R. Krueger, Esq