

New York State Department of Environmental Conservation
Facility DEC ID: 3514800070



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 3-5148-00070/00012
Mod 0 Effective Date: 07/19/2006 Expiration Date: 07/18/2011
Mod 1 Effective Date: 03/14/2007 Expiration Date: 07/18/2011

Permit Issued To: VERTIS INC
250 WEST PRATT ST 18TH FL
BALTIMORE, MD 21201

Contact: STEPHEN HULTQUIST
VERTIS INC
250 W PRATT ST 18TH FL
BALTIMORE, MD 21201
(410) 949-2214

Facility: VERTIS INC
1 TOMSONS RD
SAUGERTIES, NY 12477

Contact: LAURIE DEITRICK
VERTIS INC
ONE TOMSONS RD
SAUGERTIES, NY 12477-6000
(845) 340-8262

Description:

Title V Permit Renewal 1

The Vertis Inc. New York Division facility is located in the Village of Saugerties, Ulster County, New York. Title V Permit Renewal 1 reauthorizes existing operations at this facility. The facility operates five (5) heatset and seven (7) coldset web offset lithographic presses producing advertising inserts and other printing material for commercial use. Supporting operations include pre-press, a scrap paper recovery and baling system, a labelling operation, and a bindery.

The Standard Industrial Classification representative of this facility is 2752 - Commercial Printing Lithographic.

Volatile Organic Compound emissions have been identified from the heatset and coldset web offset lithographic presses, manual and automatic cleaning practices, an ink jet labelling process and a bindery.



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The heatset presses utilize three catalytic afterburners to control VOC emissions as required by 6NYCRRR Part 234. The coldset presses use compliant fountain solutions as defined by 6NYCRR Part 234 to control VOC emissions. Particulate emissions associated with the scrap paper recovery system are controlled by two cyclones and a bag filter unit.

Potential emissions of Volatile Organic Compounds exceed major stationary source thresholds subjecting the facility to Title V permitting in accordance with 6 NYCRR Part 201-6.

Renewal 1 Modification 1

Two permit conditions have been added and one condition has been revised, in order to incorporate requirements of 40 CFR 64 Compliance Assurance Monitoring (CAM) Rule into the permit. In addition, one of the mandatory federally enforceable permit conditions has been updated.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: KENNETH R GRZYB
 NYSDEC REGION 3
 21 SOUTH PUTT CORNERS RD
 NEW PALTZ, NY 12561

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees, and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and Determinations
Applications for permit renewals, modifications and transfers
Applications for Permit Renewals and Modifications
Permit modifications, suspensions or revocations by the Department
Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal-REGION 3
HEADQUARTERS
Submission of application for permit modification or renewal-REGION 3
HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 1-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

Item 1-1.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 1-1.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 1-1.3:



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Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 1-2: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 1-2.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

Condition 4: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;

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- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of Applications for Permit Modification or Renewal-REGION 3 HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054

Condition 1-3: Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.6(a)

Item 1-3.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054



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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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250 WEST PRATT ST 18TH FL
BALTIMORE, MD 21201

Facility: VERTIS INC
1 TOMSONS RD
SAUGERTIES, NY 12477

Authorized Activity By Standard Industrial Classification Code:
2752 - COMMERCIAL PRINTING LITHOGRAPH

Mod 0 Permit Effective Date: 07/19/2006

Permit Expiration Date: 07/18/2011

Mod 1 Permit Effective Date: 03/14/2007

Permit Expiration Date: 07/18/2011



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 1-1 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 201-6: Emission Unit Definition
- 25 6NYCRR 234.3(e): Compliance Certification
- 26 6NYCRR 234.4(b)(3): Compliance Certification
- 27 6NYCRR 234.4(c): Compliance Certification
- 24 6NYCRR 234.5(a): Compliance Certification
- 28 6NYCRR 234.6: Compliance Certification

Emission Unit Level

- 29 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 30 6NYCRR 201-6: Process Definition By Emission Unit

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- 31 6NYCRR 234.3(b)(2): Compliance Certification
- 32 6NYCRR 234.4(b)(4): sampling

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- 1-2 6NYCRR 234.3(b)(3): Compliance Certification
- 34 6NYCRR 234.4(b)(4): sampling

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- 1-3 40CFR 64: Compliance Certification
- 1-4 40CFR 64: Compliance Certification

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- 35 ECL 19-0301: Contaminant List
- 36 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 37 6NYCRR 211.2: Air pollution prohibited



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to



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Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in

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order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the

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Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit



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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit



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any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 3.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable



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regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

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(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

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In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the

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following:

i. Compliance certifications shall contain:

- the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
- and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2



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Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

21 South Putt Corners Road
New Paltz, NY 12561-1696

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements



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Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT
TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 11: Recycling and Salvage



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Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 1-1: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 03/14/2007 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-1.8

Replaces Condition(s) 12

Item 1-1.1:

No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-3.2(a)

Item 13.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-3.3(a)

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

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Condition 15: Standard Requirement - Provide Information
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:



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(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes

Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests

Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited

Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 211.3

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Item 20.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 21: Accidental release provisions.

Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 40CFR 68

Item 21.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 22: Recycling and Emissions Reduction

Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 22.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

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Condition 23: Emission Unit Definition
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: L-00002

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF FIVE (5) HEATSET WEB OFFSET LITHOGRAPHIC PRINTING PRESSES. SEVEN (7) NEGATIVE PRESSURE NATURAL GAS FIRED DRYERS ARE USED TO EVAPORATE INK OIL ASSOCIATED WITH THE LITHOGRAPHIC PRINTING PRESSES. THREE (3) NATURAL GAS FIRED CATALYTIC AFTERBURNERS PROVIDE CONTROL OF VOC EMISSIONS FROM THE DRYERS.

HEATSET PRESSES ARE IDENTIFIED AS C1, C2, C4, MRK21 AND MRK22. CATALYTIC AFTERBURNER A1 PROVIDES CONTROL OF PRESS C4. CATALYTIC AFTERBURNER A2 PROVIDES CONTROL OF PRESSES C1 AND C2. CATALYTIC AFTERBURNER A3 PROVIDES CONTROL OF PRESSES MRK21 AND MRK22. EMISSION POINTS 00002, 00003 AND 00004 ARE ASSOCIATED WITH THIS EMISSION UNIT.

EACH CATALYTIC AFTERBURNER MUST PROVIDE FOR A REDUCTION IN VOC EMISSIONS FROM DRYER EXHAUST OF AT LEAST 90 PERCENT PURSUANT TO 6NYCRR 234.3(B)(3).

Building(s): MAIN

Item 23.2(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: B-00005

Emission Unit Description:

THIS EMISSION UNIT DEFINES THE BINDERY WHICH USES ADHESIVES TO BIND SOME OF ITS PRINTED PRODUCTS. THIS ACTIVITY OCCURS AT MANY DIFFERENT PIECES OF EQUIPMENT. VOC EMISSIONS EXIT THROUGH THE GENERAL VENTILATION SYSTEM.

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Building(s): MAIN

Item 23.3(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: B-00006

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF TWO (2) INK JET PRINTERS USED FOR LABELING PRODUCT. THESE PRINTERS ARE LOCATED IN THE BINDERY. VOLATILE ORGANIC COMPOUND EMISSIONS FROM THIS EMISSION UNIT ARE FROM INK, MAKEUP AND CLEANING SOLVENT. USAGE RECORDS DEMONSTRATE THAT VOC EMISSIONS FROM THIS PROCESS ARE LESS THAN 2.5 TONS PER YEAR.

PURSUANT TO 6NYCRR 212.10(F), THIS SOURCE IS CONSIDERED EQUIPPED WITH REASONABLY AVAILABLE CONTROL TECHNOLOGY SINCE EMISSION RATE POTENTIAL OF VOC IS LESS THAN 3.0 LBS/HR AND ACTUAL VOC EMISSIONS ARE LESS THAN 15 LBS/DAY. NO ADDITIONAL CONTROL OF VOC IS REQUIRED.

EMISSIONS ASSOCIATED WITH THIS PROCESS EXIT THROUGH THE GENERAL VENTILATION SYSTEM (EP 00007) WHICH SERVICES THIS AREA.

Building(s): MAIN

Item 23.4(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: L-00001

Emission Unit Description:

THIS EMISSION UNIT CONSIST OF SEVEN (7) COLDSET WEB OFFSET LITHOGRAPHIC PRINTING PRESSES. THESE PRESSES UTILIZE FOUNTAIN SOLUTIONS WHICH ARE SUBJECT TO 10% VOC CONTENT BY WEIGHT AS APPLIED PURSUANT TO 6NYCRR 234.3(b)(2). ADDITIONAL CONTROLS ARE NOT REQUIRED. FACILITY COLDSET PRESSES IDENTIFIED INCLUDE SSC, MAG1, MAG2, MAG3, MAG4, SSC3 AND MRK10. VOC EMISSIONS EXIT THROUGH THE GENERAL VENTILATION SYSTEM EMISSION POINT 00001.

Building(s): MAIN

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Item 23.5(From Mod 0):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: P-00004

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF BALING SCRAP PAPER GENERATED BY THE VARIOUS FINISHING EQUIPMENT AT THE END OF THE PRESS LINES. THE CONFIGURATION OF THIS EQUIPMENT - FOLDERS, TRIMMERS, SLITTERS, STITCHERS, ETC - DEPENDS ON THE PARTICULAR PRODUCT PRINTED. THEREFORE, THE BLOWERS AND DUCTWORK CONSTITUTING THE SYSTEM FEEDS ARE MOVEABLE. THE DUCTS PNEUMATICALLY TRANSPORT THE "FLY WASTE" TO ONE OF TWO CYCLONES EQUIPPED WITH A FABRIC FILTER. THE CYCLONES MAY SERVE ANY SYSTEM FEED WHICH ACCUMULATES THE SCRAP PAPER DROPPED INTO A BALER. EACH CYCLONE IS ASSOCIATED WITH A BALER. A FOURTH BALER SERVES AS A BACK-UP UNIT. THE SCRAP PAPER BALES ARE LOADED ONTO TRUCKS FOR OFF-SITE RECYCLING.

THE CYCLONES AND FABRIC FILTER OPERATE IN A CLOSED LOOP WITH NEGLIGIBLE PARTICULATE EMISSIONS CIRCULATED WITHIN THE BUILDING.

PERFORMANCE OF THE FABRIC FILTERS IS EVALUATED BY A MAGNEHELIC DIFFERENTIAL PRESSURE GAUGE IN CONJUNCTION WITH BI-MONTHLY MAINTENANCE INSPECTION. FORMAL MONITORING AS PART OF AN ENFORCEABLE PERMIT CONDITION IS NOT REQUIRED.

EMISSIONS ASSOCIATED WITH THIS PROCESS EXIT THROUGH THE GENERAL VENTILATION SYSTEM (EP 00005) WHICH SERVICES THIS AREA.

Building(s): MAIN

Condition 25: Compliance Certification

Effective between the dates of 07/19/2006 and 07/18/2011



Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 25.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: L-00001 Emission Point: 00001

Emission Unit: L-00002 Emission Point: 00002

Emission Unit: L-00002 Emission Point: 00003

Emission Unit: L-00002 Emission Point: 00004

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 10 percent or greater for any consecutive six-minute period from any emission source subject to 6NYCRR Part 234.

The Department reserves the right to perform or require Vertis perform a Method 9 opacity observation.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 26: Compliance Certification
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 234.4(b)(3)

Item 26.1:

The Compliance Certification activity will be performed for the facility:



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The Compliance Certification applies to:

Emission Unit: L-00001

Emission Unit: L-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, usage and/or production records of inks, VOC and solvents must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the Department's representative. In addition, any other information required to determine compliance with 6NYCRR Part 234 must be provided to the Commissioner's representative in a format acceptable to him or her. Records must be maintained at the facility for a period of five years.

The facility shall maintain the following records for each ink, cleaning solvent, and other VOC used in the printing process, on a monthly basis:

1. The brand and product name or code for the material.
2. The quantity of material used during the calendar month.
3. The VOC content of the material.

In addition, copies of all purchase orders, invoices, and other documents for supplies and equipment that are used to support the monthly log are to be kept on site.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Certification

Effective between the dates of 07/19/2006 and 07/18/2011

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Applicable Federal Requirement: 6NYCRR 234.4(c)

Item 27.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: L-00002
Process: 00A Emission Source: 000A1

Emission Unit: L-00002
Process: 00A Emission Source: 000A2

Emission Unit: L-00002
Process: 00B Emission Source: 000A3

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The temperature rise across the bed of a catalytic afterburners A1, A2 and A3 shall be monitored continuously in order to demonstrate compliance with Part 234. This operating temperature applies during the operation of heatset presses C1, C2, C4, MRK21 and MRK22. The temperature change across the bed shall not fall below 600 degrees Fahrenheit as demonstrated by performance test conducted October 2006.

Vertis shall continue to operate continuous temperature monitors in accordance with manufacturer specification. Recorded data shall be maintained by data acquisition, circle chart or strip chart. The monitors and data recording shall be operated at all times that the catalytic afterburners are operating.

The catalytic afterburners shall be at the operating temperature while the presses are in operation. At times when the presses are not operating (ie. maintenance or repair) the catalytic afterburners may be turned off or maintained at a lower temperature.



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During periods when the catalytic afterburners are being maintained at a lower temperature due to the presses being out service, records must be kept correlating press downtime. Records must be maintained by the facility documenting periods of press shutdown corresponding with catalytic afterburner operating status. These records must be kept on file for five years.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 600 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 24: Compliance Certification
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 234.5(a)

Item 24.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: L-00001

Item 24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Vertis shall not sell, specify, or require for use, the application of a fountain solution subject to the volatile organic compound control requirements of 6 NYCRR Part 234 (10% VOC by weight as applied) if such use is prohibited by any of the provisions of this Part. The prohibition of this section shall apply to all written or oral contracts under the terms of which any fountain solution is to be applied to any substrate used in the coldset presses. This prohibition shall not apply to the following:

(1) fountain solutions used at the coldset presses where control equipment has been installed to achieve

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compliance;

(2) fountain solutions used at the coldset presses that have been granted variances for reasons of technological and economic feasibility.

The coldset presses, as of permit issue date, use compliant fountain solutions. Additional control devices have not been installed nor has a variance been granted.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

Condition 28: Compliance Certification
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 234.6

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Vertis must comply with proper handling, storage and disposal of volatile organic compounds and shall:

(a) use closed, non-leaking containers to store or dispose of cloth or paper impregnated with VOC solvents that are used for surface preparation, cleanup or ink/coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or ink/coating removal;

(c) use closed, non-leaking containers to store or dispose of inks and/or surface coatings;

(d) not use open containers to store or dispense surface



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coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

****** Emission Unit Level ******

**Condition 29: Emission Point Definition By Emission Unit
Effective between the dates of 07/19/2006 and 07/18/2011**

Applicable Federal Requirement: 6NYCRR 201-6

Item 29.1(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: B-00006

Emission Point: 00007

Height (ft.): 30

Diameter (in.): 12

Building: MAIN

Item 29.2(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: L-00001

Emission Point: 00001



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Height (ft.): 30

Diameter (in.): 12

Building: MAIN

Item 29.3(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: L-00002

Emission Point: 00002

Height (ft.): 35

Diameter (in.): 24

NYTMN (km.): 4659.4

NYTME (km.): 585.

Building: MAIN

Emission Point: 00003

Height (ft.): 35

Diameter (in.): 24

NYTMN (km.): 4659.4

NYTME (km.): 585.

Building: MAIN

Emission Point: 00004

Height (ft.): 35

Diameter (in.): 24

NYTMN (km.): 4659.4

NYTME (km.): 585.

Building: MAIN

Item 29.4(From Mod 0):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: P-00004

Emission Point: 00005

Height (ft.): 30

Length (in.): 34

Width (in.): 34

Building: MAIN

Condition 30: Process Definition By Emission Unit

Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 201-6

Item 30.1(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: L-00002

Process: 00A

Source Classification Code: 4-05-004-01

Process Description:

APPLICATION OF SOLVENT-BASED GRAPHIC ARTS
MATERIALS AND AUTOMATIC CLEANING SOLUTIONS.
THIS APPLIES TO PRESSES C1, C2 AND C4.
EMISSIONS FROM THE THESE PRESSESS AND
ASSOCIATED DRYERS ARE VENTED TO CATALYTIC
AFTERBURNERS A1 AND A2.



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Emission Source/Control: 000A1 - Control
Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: 000A2 - Control
Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: 000C1 - Process

Emission Source/Control: 000C2 - Process

Emission Source/Control: 000C4 - Process

Item 30.2(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: L-00002

Process: 00B

Source Classification Code: 4-05-004-01

Process Description:

APPLICATION OF SOLVENT-BASED GRAPHIC ARTS
MATERIALS. THIS APPLIES TO PRESSES MRK21
AND MRK22. EMISSIONS FROM THE THESE
PRESSES AND ASSOCIATED DRYERS ARE VENTED
TO CATALYTIC AFTERBURNER A3.

Emission Source/Control: 000A3 - Control
Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: MRK21 - Process

Emission Source/Control: MRK22 - Process

Item 30.3(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: B-00005

Process: 00H

Source Classification Code: 4-05-888-01

Process Description:

THE DIVISION USES A VARIETY OF ADHESIVES
IN ITS BINDERY TO BIND SOME OF ITS PRINTED
PRODUCTS.

Emission Source/Control: 0BIND - Process

Item 30.4(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

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Emission Unit: B-00006

Process: 00I

Source Classification Code: 4-05-888-01

Process Description:

USE OF SOLVENT BASED INK, MAKEUP AND
CLEANING SOLUTION.

Emission Source/Control: 0JET1 - Process

Emission Source/Control: 0JET2 - Process

Item 30.5(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: L-00001

Process: 00E

Source Classification Code: 4-05-004-31

Process Description:

FOUNTAIN SOLUTION C&W PRESSROOM PRODUCTS,
RELIABLE TC20 AND RELIABLE TC30 OR SIMILAR
PRODUCT. THREE OUNCES OF FOUNTAIN SOLUTION
TYPICALLY MIXED WITH 1.2 GALLONS WATER.
VOC WEIGHT CONTENT AS APPLIED MUST BE LESS
THAN 10% AS REQUIRED BY 6NYCRR 234.

Emission Source/Control: 00SSC - Process

Emission Source/Control: 0MAG1 - Process

Emission Source/Control: 0MAG2 - Process

Emission Source/Control: 0MAG3 - Process

Emission Source/Control: 0MAG4 - Process

Emission Source/Control: 0SSC3 - Process

Emission Source/Control: MRK10 - Process

Item 30.6(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: L-00001

Process: CL1

Source Classification Code: 4-05-888-01

Process Description:

MANUAL CLEANING OF COLDSET PRESSES USING
SOLVENT BASED SOLUTIONS.



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Emission Source/Control: 00SSC - Process

Emission Source/Control: 0MAG1 - Process

Emission Source/Control: 0MAG2 - Process

Emission Source/Control: 0MAG3 - Process

Emission Source/Control: 0MAG4 - Process

Emission Source/Control: 0SSC3 - Process

Emission Source/Control: MRK10 - Process

Item 30.7(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: L-00002

Process: CL2

Source Classification Code: 4-05-888-01

Process Description:

MANUAL CLEANING OF ALL HEATSET PRESSES
USING SOLVENT BASED CLEANING SOLUTIONS.

Emission Source/Control: 000C1 - Process

Emission Source/Control: 000C2 - Process

Emission Source/Control: 000C4 - Process

Emission Source/Control: MRK21 - Process

Emission Source/Control: MRK22 - Process

Item 30.8(From Mod 0):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-00004

Process: 00G

Source Classification Code: 3-07-013-99

Process Description:

COLLECTION AND BALING OF SCRAP PAPER
GENERATED FROM VARIOUS FINISHING
EQUIPMENT.

Emission Source/Control: 00BAG - Control

Control Type: FABRIC FILTER



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Emission Source/Control: CYCL1 - Control
Control Type: FABRIC FILTER

Emission Source/Control: CYCL2 - Control
Control Type: FABRIC FILTER

Emission Source/Control: BALEA - Process

Emission Source/Control: BALEB - Process

Emission Source/Control: BALEC - Process

Emission Source/Control: BALED - Process

Condition 31: Compliance Certification
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 234.3(b)(2)

Item 31.1:

The Compliance Certification activity will be performed for:

Emission Unit: L-00001

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

Vertis shall continue to use fountain solutions containing 10 percent by weight or less of volatile organic compounds as applied within coldset presses SSC, MAG1, MAG2, MAG3, MAG4, SSC3 and MRK10. Compliance shall be verified by maintaining records of formulation data as specified by 6 NYCRR §234.4(b)(2) and (3). These records shall contain the following information:

1. Certification from the fountain solution supplier/manufacturer which verifies the composition of the fountain solution solvent/volatiles, if supported by actual batch records,
2. Purchase, usage, and/or production records of the



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fountain solutions and solvents.

3. Any other parameters used to verify compliance.

Upon request by DEC, Vertis shall perform Method 24 analyses (or supply samples to DEC for analysis) to verify the VOC content and volatile fraction of the fountain solutions. When there is any discrepancy between the calculated formulation and the Method 24 results, the Method 24 results shall be used for compliance purposes.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FOUNTAIN SOLUTION

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 10 percent by weight

Reference Test Method: Method 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 32: sampling

Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 234.4(b)(4)

Item 32.1:

This Condition applies to Emission Unit: L-00001

Item 32.2:

The results of any analysis or other procedure used for establishing compliance must be provided to the commissioner's representative. Representatives of the department shall be permitted, during reasonable business hours, to obtain ink and/or fountain solution samples for the purpose of determining compliance with 6NYCRR Part 234.

Condition 1-2: Compliance Certification

Effective between the dates of 03/14/2007 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 234.3(b)(3)

Replaces Condition(s) 33

Item 1-2.1:

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The Compliance Certification activity will be performed for:

Emission Unit: L-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-2.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

An air cleaning device shall provide for a reduction in volatile organic compound emissions from the dryer exhaust of at least 90 percent.

Emission testing shall be conducted on all three catalytic afterburners, to ascertain compliance with this limit. A report of the test results shall be submitted to the Department within 60 days after completion of the test and before the expiration date of this permit.

Lower Permit Limit: 90 percent reduction by weight

Reference Test Method: Method 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 34: sampling

Effective between the dates of 07/19/2006 and 07/18/2011

Applicable Federal Requirement: 6NYCRR 234.4(b)(4)

Item 34.1:

This Condition applies to Emission Unit: L-00002

Item 34.2:

The results of any analysis or other procedure used for establishing compliance must be provided to the commissioner's representative. Representatives of the department shall be permitted, during reasonable business hours, to obtain ink and/or fountain solution samples for the purpose of determining compliance with 6NYCRR Part 234.

Condition 1-3: Compliance Certification

Effective between the dates of 03/14/2007 and 07/18/2011

Applicable Federal Requirement: 40CFR 64



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Item 1-3.1:

The Compliance Certification activity will be performed for:

Emission Unit: L-00002

Item 1-3.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Sampling and testing of the catalyst in each oxidizer shall be conducted annually, to assure the catalyst activity (life) remains satisfactory. The catalyst activity must be within manufacturer specifications, and the catalyst must be replaced if not within specifications. A record shall be kept of all catalyst testing and replacement.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-4: Compliance Certification

Effective between the dates of 03/14/2007 and 07/18/2011

Applicable Federal Requirement: 40CFR 64

Item 1-4.1:

The Compliance Certification activity will be performed for:

Emission Unit: L-00002

Item 1-4.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Oxidizer components, including the burner assembly, interlocks, and the bypass valve, shall be inspected periodically, as recommended by the manufacturer. Proper operation of the interlocks and the bypass valve will be checked. A record shall be kept of all inspections of and repairs to oxidizer components.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 35: Contaminant List
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable State Requirement: ECL 19-0301

Item 35.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this



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permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY998-00-0

Name: VOC

Condition 36: Unavoidable noncompliance and violations
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable State Requirement: 6NYCRR 201-1.4

Item 36.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air



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quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 37: Air pollution prohibited
Effective between the dates of 07/19/2006 and 07/18/2011

Applicable State Requirement: 6NYCRR 211.2

Item 37.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.