



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 3-5148-00070/00013  
Effective Date: 07/12/2011                      Expiration Date: No expiration date

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

**Description:**

The New York Division of Vertis Inc. produces advertising inserts and other printed materials for commercial use. The facility operates five (5) heatset and two (2) coldset web offset lithographic printing presses. Supporting operations include pre-press, a scrap paper recovery and baling system, a labeling operation, and a bindery.

VOC emissions from the heatset presses are controlled by natural gas fired catalytic afterburners. Particulate emissions from the scrap paper recovery system are controlled by two cyclones and a bag filter unit.

VOC emissions from the facility are limited to 40.89 tons per year in order to stay below the major source threshold of 50 tons per year. Thus, the facility is not subject to the requirements of Title V of the Federal Clean Air Act. The facility will track usage of VOC-containing materials to demonstrate compliance with the VOC limit.

The facility is subject to 6NYCRR Parts 200, 201, 202, 211, 212, and 234.

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



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 S 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 compliance 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 any 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
- Permit modifications, suspensions or revocations by the Department

**Facility Level**

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



**DEC GENERAL CONDITIONS**  
**\*\*\*\* General Provisions \*\*\*\***  
**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 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**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.



**Applicable State Requirement: 6 NYCRR 621.13**

**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;
- 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 application for permit modification or renewal-REGION 3 HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.6 (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

**New York State Department of Environmental Conservation**

Permit ID: 3-5148-00070/00013

Facility DEC ID: 3514800070



**Permit Under the Environmental Conservation Law (ECL)**

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY  
PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: VERTIS INC  
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

Permit Effective Date: 07/12/2011  
date.

Permit Expiration Date: No expiration  
date.



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 200.7: Maintenance of Equipment
- 3 6 NYCRR 201-1.7: Recycling and Salvage
- 4 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 5 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 6 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 7 6 NYCRR 202-1.1: Required Emissions Tests
- \*8 6 NYCRR 201-7.2: Capping Monitoring Condition
- 9 6 NYCRR 234.3 (c) (1): Compliance Demonstration
- 10 6 NYCRR 234.6: Compliance Demonstration
- 11 6 NYCRR 234.7: Compliance Demonstration
- 12 6 NYCRR 234.8: Compliance Demonstration

**Emission Unit Level**

- 13 6 NYCRR 201-7.2: Emission Unit Permissible Emissions

**EU=L-00001**

- 14 6 NYCRR 234.3 (d) (1) (iii): Compliance Demonstration
- 15 6 NYCRR 234.5: Compliance Demonstration

**EU=L-00002**

- 16 6 NYCRR 234.3 (b) (1) (i): Compliance Demonstration
- 17 6 NYCRR 234.3 (b) (1) (i): Compliance Demonstration
- 18 6 NYCRR 234.3 (d) (1) (i) ('c'): Compliance Demonstration
- 19 6 NYCRR 234.4 (c): Compliance Demonstration

**EU=P-00004,EP=00005**

- 20 6 NYCRR 212.4 (c): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 21 ECL 19-0301: Contaminant List
- 22 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 23 6 NYCRR Subpart 201-5: Emission Unit Definition
- 24 6 NYCRR 201-5.3 (b): Compliance Demonstration
- 25 6 NYCRR 211.2: Visible Emissions Limited

**Emission Unit Level**

- 26 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 27 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.



**FEDERALLY ENFORCEABLE CONDITIONS**  
**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**Item A: Sealing - 6 NYCRR 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

**Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6**

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

**Item C: Maintenance of Equipment - 6 NYCRR 200.7**

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.

**Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2**

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

**Item E: Emergency Defense - 6 NYCRR 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 F: Recycling and Salvage - 6 NYCRR 201-1.7**

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 6 NYCRR.

**Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8**

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.

**Item H: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)**

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 6 NYCRR Subpart 201-3. 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 6 NYCRR Subpart 201-3, 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.

**Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)**

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. 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 6 NYCRR Subpart 201-3, 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.

**Item J: Required Emission Tests - 6 NYCRR 202-1.1**



An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

**Item K: Visible Emissions Limited - 6 NYCRR 211.3**

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.

**Item L: Open Fires Prohibitions - 6 NYCRR 215.2**

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item M: 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 N: 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.

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 1: Acceptable Ambient Air Quality**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 200.6**

**Item 1.1:**

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit 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: Maintenance of Equipment**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 2.1:**

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 3: Recycling and Salvage**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 201-1.7**

**Item 3.1:**

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 4: Prohibition of Reintroduction of Collected Contaminants to the air**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 201-1.8**

**Item 4.1:**

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 5: Exempt Sources - Proof of Eligibility**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

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

**Item 5.1:**

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 6: Trivial Sources - Proof of Eligibility**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

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

**Item 6.1:**

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.

**Condition 7: Required Emissions Tests**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Item 7.1:**

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.

**Condition 8: Capping Monitoring Condition**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 201-7.2**

**Item 8.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would



New York State Department of Environmental Conservation

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95 percent shall apply.

Parameter Monitored: VOC

Upper Permit Limit: 40.89 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2012.

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

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement: 6 NYCRR 234.3 (c) (1)**

**Item 9.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: L-00001

Emission Unit: L-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Cleaning materials containing VOC shall not be used in an offset lithographic printing process unless:

(i) The cleaning material, as applied, contains less than 70.0 percent by weight VOC; or

(ii) The cleaning material, as applied, has a composite vapor pressure of less than or equal to 10 millimeters mercury at 20 degrees Celsius.

Documentation, such as material safety data sheets, from the cleaning material vendor shall be used to demonstrate compliance with this permit condition.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**



**Applicable Federal Requirement:6 NYCRR 234.6**

**Item 10.1:**

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

Emission Unit: L-00001

Emission Unit: L-00002

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

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a facility subject to 6NYCRR Part 234 shall not:

(a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(c) Use open containers to store, dispose or dispense ink, coating or adhesive 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 ink, coating, or adhesive to a substrate.

Daily inspections for open containers shall be performed in each press area if in operation, and a record kept that the inspection was performed. Open containers, if found, shall be covered.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 11: Compliance Demonstration**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 234.7**

**New York State Department of Environmental Conservation**

Permit ID: 3-5148-00070/00013

Facility DEC ID: 3514800070



**Item 11.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, use, and production records of ink, coating, adhesive, VOCs, solvent, fountain solution and cleaning material must be maintained in a format acceptable to the Department, and upon request, submitted to the Department. Any other information required to determine compliance with this Part must be provided to the Department in an acceptable format. Records must be maintained at the facility for five years.

The results of an analysis or other procedure used to establish compliance with this Part must be provided to the Department. Department representatives shall be permitted, during reasonable business hours, to obtain ink, coating, adhesive, cleaning material and fountain solution samples to determine compliance with this Part.

The owner or operator of a graphic art facility which is not subject to the control requirements of this Part because its annual potential to emit VOC or its total actual VOC emissions, whichever applies is below the applicability criteria, must maintain records in a format acceptable to the Department that verify the facility's annual potential to emit VOC or its total actual VOC emissions. Upon request, these records must be submitted to the Department.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 12:      Compliance Demonstration**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 234.8**

**Item 12.1:**

The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration 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 12.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A person shall not cause or allow emissions having an average opacity of 10 percent or greater for any consecutive six minute period from any emission source subject to this Part into the outdoor atmosphere.

Parameter Monitored: OPACITY  
Upper Permit Limit: 10 percent  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

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

**Condition 13: Emission Unit Permissible Emissions**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 201-7.2**

**Item 13.1:**

The sum of emissions from all regulated processes specified in this permit for the emission unit cited

shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: B-00006  
CAS No: 0NY998-00-0  
Name: VOC  
PTE(s): 5,000 pounds per year

Emission Unit: L-00001  
CAS No: 0NY998-00-0  
Name: VOC  
PTE(s): 7,817 pounds per year

Emission Unit: L-00002  
CAS No: 0NY998-00-0  
Name: VOC



PTE(s): 68,957 pounds per year

**Condition 14: Compliance Demonstration**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 234.3 (d) (1) (iii)**

**Item 14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: L-00001

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

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

An offset lithographic printing process that uses fountain solutions containing VOC shall not operate if it is located in a severe ozone non-attainment area or is located at a facility with total actual annual VOC graphic arts emissions of three tons or more on a 12-month rolling basis, unless, for cold-set web offset lithographic printing presses, the fountain solution as applied contains no more than 5.0 percent alcohol substitute by weight and no alcohol.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: VOC's

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 5.0 percent alcohol substitute

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL  
CHANGE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 15: Compliance Demonstration**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 234.5**

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: L-00001

Regulated Contaminant(s):



CAS No: 0NY998-00-0 VOC

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A person shall not sell, specify, or require the application of a coating, ink or adhesive on a substrate if such activity 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 a coating, ink or adhesive is to be applied to a substrate.

This prohibition shall not apply to the following:

(1) Ink, coating, or adhesive used in printing processes where control equipment has been installed to demonstrate compliance with this Part; or

(2) Ink, coating, or adhesive used in printing processes that have been granted variances for reasons of technological and economic feasibility per section 234.3(f) of this Part.

A person selling an ink, coating, or adhesive used in a printing process subject to this Part must, upon request, provide the buyer with certification of the VOC content of the coating, ink or adhesive supplied.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 234.3 (b) (1) (i)**

**Item 16.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: L-00002

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To assure that the catalytic afterburners will provide a minimum VOC removal efficiency of 95.0 percent, the following maintenance shall be performed:

(1) An annual inspection of afterburner components, and



repairs made as necessary; and

(2) Annual sampling and testing of each afterburner catalyst. The catalyst activity must be within manufacturer specifications, and the catalyst must be replaced if not within specifications.

A record of all maintenance and repairs shall be kept by the facility.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 17: Compliance Demonstration**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 234.3 (b) (1) (i)**

**Item 17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: L-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The catalytic afterburners shall provide a VOC removal efficiency of 95.0 percent or greater.

Emission testing was conducted in September of 2010, which demonstrated compliance with this requirement. Subsequent testing and reporting shall be conducted if directed by the Department, in accordance with 6NYCRR Part 202-1.

Lower Permit Limit: 95.0 percent reduction

Reference Test Method: Method 25A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 18: Compliance Demonstration**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 234.3 (d) (1) (i) ('c')**

**Item 18.1:**



The Compliance Demonstration activity will be performed for:

Emission Unit: L-00002

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

**Item 18.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

An offset lithographic printing process that uses fountain solutions containing VOC shall not operate if it is located in a severe ozone non-attainment area or is located at a facility with total actual annual VOC graphic arts emissions of three tons or more on a 12-month rolling basis, unless for heat-set web offset lithographic printing processes the fountain solution as applied contains no more than a 5.0 percent alcohol substitute by weight and no alcohol.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: VOC's

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 5.0 percent alcohol substitute

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 19: Compliance Demonstration**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 234.4 (c)**

**Item 19.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: L-00002

**Item 19.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The inlet temperature at the catalyst bed of each of the catalytic afterburners must be monitored continuously, and this temperature shall not fall below 600 degrees



Fahrenheit. The inlet temperature shall also be recorded continuously on a circle chart or strip chart, whenever the catalytic afterburners are operating.

The catalytic afterburners must be in operation whenever the associated heatset presses are in operation. At times when the presses are not operating, the associated catalytic afterburners may be turned off or maintained at a lower temperature. During these times, records must be kept by the facility documenting periods of press shutdown corresponding with catalytic afterburner operating status.

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: UPON REQUEST BY REGULATORY AGENCY

**Condition 20: Compliance Demonstration**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 20.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00004

Emission Point: 00005

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 20.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

To assure compliance with this emission limit, the facility shall:

(1) Monitor the differential pressure across the fabric filter with a magnehelic gauge; and

(2) Perform bi-monthly inspections of the fabric filter, and keep a record of the inspections.

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: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

**Item B: 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 only enforceable.**



**Condition 21: Contaminant List**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable State Requirement:ECL 19-0301**

**Item 21.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY075-00-0  
Name: PARTICULATES

CAS No: 0NY998-00-0  
Name: VOC

**Condition 22: Unavoidable noncompliance and violations**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 22.1:**

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 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 23: Emission Unit Definition**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 23.1:**

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

Emission Unit: B-00006

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF THREE (3) INK JET PRINTERS USED FOR LABELING PRODUCT. THESE PRINTERS ARE LOCATED IN THE BINDERY. VOC EMISSIONS FROM THIS EMISSION UNIT ARE FROM INK, MAKEUP AND CLEANING SOLVENT. EMISSIONS EXIT THROUGH THE GENERAL VENTILATION SYSTEM (EP 00007). USAGE RECORDS DEMONSTRATE THAT VOC EMISSIONS FROM THE PRINTERS ARE LESS THAN 2.5 TONS PER YEAR. PURSUANT TO 6NYCRR PART 212.10(C), REASONABLY AVAILABLE CONTROL TECHNOLOGY IS NOT REQUIRED FOR THIS EMISSION UNIT, SINCE VOC EMISSION RATE POTENTIAL IS LESS THAN 3.0 POUNDS PER HOUR.

Building(s): MAIN

**Item 23.2:**

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

Emission Unit: L-00001

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF TWO (2) COLDSET WEB OFFSET LITHOGRAPHIC PRINTING PRESSES, WHICH ARE IDENTIFIED AS MAG1 AND



SSC3. VOC EMISSIONS EXIT THROUGH THE  
GENERAL VENTILATION SYSTEM (EP 00001).

Building(s): MAIN

**Item 23.3:**

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  
HEATSET PRESSES, WHICH ARE IDENTIFIED AS  
C1, C2, C4, MRK21 AND MRK22. 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 (OXIDIZERS) PROVIDE CONTROL OF  
VOC EMISSIONS FROM THE DRYERS. CATALYTIC  
AFTERBURNER A1 PROVIDES CONTROL OF PRESS  
C4, AND VENTS TO EP 00002. CATALYTIC  
AFTERBURNER A2 PROVIDES CONTROL OF PRESSES  
C1 AND C2, AND VENTS TO EP 00003.  
CATALYTIC AFTERBURNER A3 PROVIDES CONTROL  
OF PRESSES MRK21 AND MRK22, AND VENTS TO EP  
00004.

Building(s): MAIN

**Item 23.4:**

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

Building(s): MAIN

**Condition 24: Compliance Demonstration**  
Effective between the dates of 07/12/2011 and Permit Expiration Date

**Applicable State Requirement: 6 NYCRR 201-5.3 (b)**

**Item 24.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 24.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following emission factors, as approved or published by the US EPA, will be used in determining VOC emissions from the facility.

For the heatset presses,  
Inks: 20 % VOC retention (80 % release)  
Fountain solution: 70 % capture and control  
30 %

fugitive  
Automatic blanket wash: 40 % capture and control  
60 %

fugitive  
Manual blanket wash: 50 % VOC retention (50 % release)

Adhesive: 100 % release

Anti-stat: 100 % release

Ink oil: 0.34 pounds of VOC per 1000 gallons of oil consumed,

unless AP-42 is revised, then the most recent factor will be used

Natural gas: 5.5 pounds of VOC per million cubic feet of gas consumed,

unless AP-42 is revised, then the most recent factor will be used

**New York State Department of Environmental Conservation**

Permit ID: 3-5148-00070/00013

Facility DEC ID: 3514800070



For the coldset presses,  
Inks: 95 % VOC retention (5 % release)  
Fountain solution: 100 % release  
Manual blanket wash: 50 % retention (50 %  
release)  
Adhesive: 100 % release

For the inkjet printers,  
All materials: 100 % release

Monitoring Frequency: MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2012.  
Subsequent reports are due every 12 calendar month(s).

**Condition 25: Visible Emissions Limited**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 25.1:**

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.

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

**Condition 26: Emission Point Definition By Emission Unit**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 26.1:**

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

NYTMN (km.): 4659.6

NYTME (km.): 585.

Building: MAIN

**Item 26.2:**

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

Emission Unit: L-00001

Emission Point: 00001

Height (ft.): 30

Diameter (in.): 12



NYTMN (km.): 4659.6      NYTME (km.): 585.      Building: MAIN

**Item 26.3:**

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 26.4:**

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  
NYTMN (km.): 4659.6      NYTME (km.): 585.      Building: MAIN

**Condition 27: Process Definition By Emission Unit**  
**Effective between the dates of 07/12/2011 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 27.1:**

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

Emission Unit: B-00006  
Process: 00I      Source Classification Code: 4-05-888-01

Process Description:  
USE OF SOLVENT BASED INK, MAKEUP AND  
CLEANING SOLUTION ASSOCIATED WITH THE INK  
JET PRINTERS.

Emission Source/Control: 0JET1 - Process

Emission Source/Control: 0JET2 - Process

Emission Source/Control: 0JET3 - Process

**Item 27.2:**

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:  
APPLICATION OF COLDSET INKS AND FOUNTAIN  
SOLUTION C&W PRESSROOM PRODUCTS (PACESETTER  
990.5 OR SIMILAR PRODUCT). THREE OUNCES OF  
FOUNTAIN SOLUTION ARE TYPICALLY MIXED WITH  
1.2 GALLONS WATER.

Emission Source/Control: 0MAG1 - Process

Emission Source/Control: 0SSC3 - Process

**Item 27.3:**

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

Emission Unit: L-00001  
Process: 00J Source Classification Code: 4-05-888-01  
Process Description: USE OF ADHESIVES ON THE COLDSET PRESSES.

Emission Source/Control: 0MAG1 - Process

Emission Source/Control: 0SSC3 - Process

**Item 27.4:**

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.

Emission Source/Control: 0MAG1 - Process

Emission Source/Control: 0SSC3 - Process

**Item 27.5:**

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, INCLUDING INKS AND FOUNTAIN  
SOLUTIONS, IN THE HEATSET PRESSES.  
EMISSIONS CONSIST OF VOLATILE ORGANIC  
COMPOUNDS FROM THESE MATERIALS AND PRODUCTS  
OF COMBUSTION OF NATURAL GAS FROM THE  
ASSOCIATED PRESS DRYERS AND CATALYTIC  
OXIDIZERS.



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

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

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

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 27.6:**

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 AUTOMATIC CLEANING (BLANKET WASH) SOLUTIONS. THIS APPLIES ONLY TO PRESSES C1, C2, AND C4. 40 PERCENT OF THE PROCESS EMISSIONS ARE VENTED TO AFTERBURNERS A1 AND A2.

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 27.7:**

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

Emission Unit: L-00002

Process: 00H

Source Classification Code: 4-05-888-01

Process Description:

USE OF ADHESIVES AND COATINGS, SUCH AS ANTI-STAT AND SILICONE, ASSOCIATED WITH THE HEASTSET PRESSES.



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 27.8:**

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 27.9:**

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

Emission Source/Control: CYCL1 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: CYCL2 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: BALEA - Process

Emission Source/Control: BALEB - Process



Emission Source/Control: BALEC - Process

Emission Source/Control: BALED - Process

