



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 5-4115-00011/00055  
Effective Date: 03/26/2010 Expiration Date: 03/25/2015

Permit Issued To: QUADGRAPHICS INC  
W 224 N3322 DUPLAINVILLE RD  
PEWAUKEE, WI 53072-4195

Contact: CHUCK RAYMOND  
QUADGRAPHICS  
56 DUPLAINVILLE ROAD  
SARATOGA SPRINGS, NY 12866  
(518) 581-4155

Facility: QUADGRAPHICS  
56 DUPLAINVILLE RD|GRANDE INDUSTRIAL PARK  
SARATOGA SPRINGS, NY 12866

Description:

The facility prints and assembles magazines, catalogs, coupons and inserts. Though a process called imaging, print plates are produced for use on lithographic printing presses, where the images are transferred onto a paper substrate. The printing is conducted using a heat-set web offset lithographic printing process. The printed material is then bound into the final product and mailing labels are applied.

The facility contains lithographic presses and associated catalytic or regenerative thermal oxidizers, as well as a paper trim collection system made up of a network of cyclones and baghouse fabric filters. Other equipment includes boilers for facility heating, bulk above ground storage tanks, and various finishing equipment such as ink-jet label printers and binders.

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: MARC S MIGLIORE  
NYSDEC  
232 GOLF COURSE RD  
WARRENSBURG, NY 12885

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 5  
SUBOFFICE - WARRENSBURG



**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 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 to the Department for approval.



**Condition 4: Permit modifications, suspensions or revocations by the Department**  
**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 5**  
**SUBOFFICE - WARRENSBURG**  
**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 5 Sub-office  
Division of Environmental Permits  
232 Golf Course Road, PO Box 220  
Warrensburg, NY 12885-0220  
(518) 623-1281

**New York State Department of Environmental Conservation**

Permit ID: 5-4115-00011/00055

Facility DEC ID: 5411500011



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

**ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: QUADGRAPHICS INC  
W 224 N3322 DUPLAINVILLE RD  
PEWAUKEE, WI 53072-4195

Facility: QUADGRAPHICS  
56 DUPLAINVILLE RD|GRANDE INDUSTRIAL PARK  
SARATOGA SPRINGS, NY 12866

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

Permit Effective Date: 03/26/2010

Permit Expiration Date: 03/25/2015



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 2 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 3 6 NYCRR 201-6.5 (a) (7): Fees
- 4 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
- 5 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 6 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 1 6 NYCRR 215.2: Open Fires - Prohibitions
- 9 6 NYCRR 200.7: Maintenance of Equipment
- 10 6 NYCRR 201-1.7: Recycling and Salvage
- 11 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 12 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 13 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 14 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
- 15 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
- 16 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
- 17 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 6 NYCRR 211.3: Visible Emissions Limited
- 20 40 CFR Part 68: Accidental release provisions.
- 21 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 22 6 NYCRR Subpart 201-6: Emission Unit Definition
- 23 6 NYCRR 201-6.5 (e): Compliance Certification
- 24 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- \*25 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 26 6 NYCRR 234.3 (b) (3): Compliance Certification
- 27 40 CFR Part 64: Compliance Certification
- 28 40 CFR Part 64: Compliance Certification
- 29 40 CFR Part 64: Compliance Certification
- 30 40 CFR Part 64: Compliance Certification
- 31 40 CFR Part 64: Compliance Certification
- 32 40 CFR Part 64: Compliance Certification
- 33 40 CFR Part 64: Compliance Certification

#### Emission Unit Level

- 34 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 35 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

#### EU=U-CRTOS

- 36 6 NYCRR 234.3 (b) (3): dryer control requirements
- 37 6 NYCRR 234.4 (c): control requirement
- 38 6 NYCRR 234.6: Compliance Certification

#### EU=U-PRESS

**New York State Department of Environmental Conservation**

Permit ID: 5-4115-00011/00055

Facility DEC ID: 5411500011



- 39 6 NYCRR 234.3 (b) (3): dryer control requirements
- 40 6 NYCRR 234.4 (c): control requirement
- 41 6 NYCRR 234.6: Compliance Certification

**EU=U-TRIMS**

- 42 6 NYCRR 212.6 (a): Compliance Certification
- 43 6 NYCRR 212.6 (a): Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 44 ECL 19-0301: Contaminant List
- 45 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 46 6 NYCRR 211.2: Air pollution prohibited

NOTE: \* preceding the condition number indicates capping.



**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 - 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 B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 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 Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR 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 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 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 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 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 - 6 NYCRR 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 order to maintain compliance with the conditions of this permit.

**Item H: Property Rights - 6 NYCRR 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 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 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 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 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 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 2: Acceptable Ambient Air Quality**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:6 NYCRR 200.6**

**Item 2.1:**  
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 3: Fees**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 3.1:**  
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 4: Recordkeeping and reporting of compliance monitoring**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 4.1:**



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 5: Monitoring, Related Recordkeeping, and Reporting Requirements.**

**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 5.1:**

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 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 6: Compliance Certification**

**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**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:

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.

(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.

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 60 days after the reporting period.  
The initial report is due 8/29/2010.  
Subsequent reports are due every 6 calendar month(s).



**Condition 7: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:6 NYCRR 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.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

**Condition 8: Recordkeeping requirements**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:6 NYCRR 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 1: Open Fires - Prohibitions**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:6 NYCRR 215.2**

**Item 1.1:**

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

**Item 1.2**

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

(a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of



this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.

- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**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 9: Maintenance of Equipment  
Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement: 6 NYCRR 200.7**



**Item 9.1:**

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 10: Recycling and Salvage**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 10.1:**

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 11: Prohibition of Reintroduction of Collected Contaminants to the air**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 11.1:**

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 12: Exempt Sources - Proof of Eligibility**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 12.1:**

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 13: Trivial Sources - Proof of Eligibility**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 13.1:**

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





(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 17: Off Permit Changes**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 17.1:**

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 18: Required Emissions Tests**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 18.1:**

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 19: Visible Emissions Limited**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:6 NYCRR 211.3**

**Item 19.1:**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted



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Facility DEC ID: 5411500011



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

Emission Unit: U-CRTOS

Emission Unit Description:

This Emission Unit contains seven (7) heatset web offset lithographic printing presses ducted to a bank of three (3) regenerative thermal oxidizers (RTOs). A minimum of two (2) RTOs must be in operation whenever the combined exhaust flow rate is greater than 43,000 scfm. 43,000scfm is represented by a fan speed of 45 hz, as a surrogate for measuring air flow.

Building(s): 5  
9

**Item 22.2:**

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

Emission Unit: U-PRESS

Emission Unit Description:

This Emission Unit contains nine (9) heatset web offset lithographic printing presses and associated catalytic oxidizers and RTOs.

Building(s): 1  
3  
9

**Item 22.3:**

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

Emission Unit: U-TRIMS

Emission Unit Description:

Paper trim waste collection system consisting of a network of cyclone and baghouse particulate control devices.

Building(s): 1  
2  
3  
4  
5  
6 - EAST  
7

**Condition 23: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 23.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 23.2:**

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 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:

Region 5 Suboffice  
232 Golf Course Road.  
Warrensburg, NY 12885-0220

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 60 days after the reporting period.  
The initial report is due 3/1/2011.  
Subsequent reports are due on the same day each year

**Condition 24: Facility Permissible Emissions**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 24.1:**

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following  
Potential To Emit (PTE) rate for each regulated contaminant:

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

PTE: 456,000 pounds per year

**Condition 25: Capping Monitoring Condition**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 25.1:**

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 otherwise be subject to:

6 NYCRR Subpart 231-2

**Item 25.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission

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limits, terms, conditions and standards in this permit.

**Item 25.3:**

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.

**Item 25.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 25.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 25.6:**

The Compliance Certification activity will be performed for the Facility.

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

**Item 25.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility is capping out of New Source Review requirements by limiting VOC emissions, facility wide to 228 tons per year on a 12 month rolling basis. The facility will maintain monthly usage records for fountain solutions, inks and solvents and will calculate emissions using appropriate control device control efficiencies demonstrated during the most recent stack tests. Fugitive emissions are included in the VOC cap. Calculations are based on 70% capture for fountain solutions, 85% capture for ink solutions and 40% capture for other solvents.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: INK, AS APPLIED, INCLUDING SOLVENTS

Upper Permit Limit: 228 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD - SEE MONITORING  
DESCRIPTION

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2010.

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

**Condition 26: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 26.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-CRTOS

Emission Unit: U-PRESS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 26.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Each oxidizer controlling emissions from a printing press must meet a minimum of 90% control efficiency. Stack testing to demonstrate compliance with this limit is required once per permit term unless additional testing is required by the permitting authority. This testing will also establish the control efficiency used for calculating facility-wide annual emissions.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 90 percent by weight

Reference Test Method: method 25A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2010.

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

**Condition 27: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 27.1:**



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Process: PR2 Emission Source: CA021

Emission Unit: U-CRTOS  
Process: PR2 Emission Source: CA022

Emission Unit: U-CRTOS  
Process: PR2 Emission Source: CA023

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

**Item 28.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The regenerative thermal oxidizers must provide for a reduction in emissions of volatile organic compounds (VOCs) of at least 90 percent.

During press operation, combustion chamber temperature of an operating oxidizer must be at least as high as the temperature that existed during the last successful stack test. Currently that temperature is 1425 degrees F. Startup of an oxidizer shall only occur if the inlet temperature of the RTO is at least 1325 degrees F.

Parameter Monitored: TEMPERATURE  
Lower Permit Limit: 1425 degrees Fahrenheit  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 8/29/2010.  
Subsequent reports are due every 6 calendar month(s).

**Condition 29: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 29.1:**

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

Emission Unit: U-PRESS  
Process: PRN Emission Source: 00M95

Emission Unit: U-PRESS  
Process: PRN Emission Source: 00M99

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

**Item 29.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

During press operation, defined as when the press speed is over 500 feet per minute, the oxidizer exhaust flow rate must be at least 1700 cfm (corrected to 70 degrees F).

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 1700 cubic feet per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2010.

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

**Condition 30: Compliance Certification**

**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 30.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-CRTOS

Process: PR2

Emission Source: CA021

Emission Unit: U-CRTOS

Process: PR2

Emission Source: CA022

Emission Unit: U-CRTOS

Process: PR2

Emission Source: CA023

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

**Item 30.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

During press operation, each operating RTO must have an



inlet flow rate of at least 8700 scfm as represented by a fan speed of 15 hz. When the flow rate exceeds 43,000 scfm (as represented by a fan speed of 45 hz) at least two RTO's must be in operation.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 8700 cubic feet per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2010.

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

**Condition 31: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 31.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-CRTOS

Emission Unit: U-PRESS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 31.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Quarterly maintenance shall include inspection and any necessary repair or replacement of control burners, temperature sensors and other elements that could affect oxidizer performance.

The CO levels of all oxidizer exhausts shall be monitored quarterly. If the CO concentration for any press other than M-87 is greater than 50 ppm, the press and oxidizer shall be immediately inspected adjusted and/or repaired as necessary. If the CO concentration for press M-87 is greater than 500 ppm, the press and oxidizer shall be immediately inspected adjusted and/or repaired as necessary After completion of the maintenance, the stack shall be retested and the CO concentration entered in the permanent log record.

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Monitoring Frequency: QUARTERLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 8/29/2010.  
Subsequent reports are due every 6 calendar month(s).

**Condition 32: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 32.1:**

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

Emission Unit: U-PRESS Process: PRN	Emission Source: 00M20
Emission Unit: U-PRESS Process: PRN	Emission Source: 00M35
Emission Unit: U-PRESS Process: PRN	Emission Source: 00M57
Emission Unit: U-PRESS Process: PRN	Emission Source: 00M60
Emission Unit: U-PRESS Process: PRN	Emission Source: 00M61
Emission Unit: U-PRESS Process: PRN	Emission Source: 00M81
Regulated Contaminant(s): CAS No: 0NY998-00-0	VOC

**Item 32.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The catalytic oxidizers for these presses must provide for a reduction in emissions of volatile organic compounds (VOCs) of at least 90 percent.

The inlet air temperature to the catalytic bed must be at least as high as the temperature that existed during the last successful stack test. The current requirement is 600 degrees F during normal operation. Startup of a press shall only occur if the inlet temperature of the catalytic oxidizer is at least 550 degrees F.

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Parameter Monitored: TEMPERATURE  
Lower Permit Limit: 600 degrees Fahrenheit  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 8/29/2010.  
Subsequent reports are due every 6 calendar month(s).

**Condition 33: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 33.1:**

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

Emission Unit: U-CRTOS

Emission Unit: U-PRESS

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

**Item 33.2:**

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 and the Department reserves the right to conduct a Method 9 observation at any time. In addition: In order to comply with this and the requirements of 40 CFR 64 (CAM);

The permittee will conduct observations of visible emissions from the affected sources to which this condition applies at the monitoring frequency stated below while the process is in operation.

If visible emissions are observed, the permittee shall stop the press to the affected emission point as soon as practicable for repairs and/or adjustment. Upon restart of the press, visible observations shall be made to verify that the problem has been corrected.

If visible emissions above those that are normal and in

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compliance continue to be present after corrections are made, the permittee will immediately notify The Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

Parameter Monitored: VISIBLE EMISSIONS

Upper Permit Limit: 10 percent

Monitoring Frequency: WEEKLY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -  
SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2010.

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

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

**Condition 34: Emission Point Definition By Emission Unit  
Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 34.1:**

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

Emission Unit: U-CRTOS

Emission Point: 00021

Height (ft.): 50

Diameter (in.): 70

NYTMN (km.): 4768.558

NYTME (km.): 595.441

Building: 9

Emission Point: 00022

Height (ft.): 50

Diameter (in.): 70

NYTMN (km.): 4768.57

NYTME (km.): 595.438

Building: 9

Emission Point: 00023

Height (ft.): 50

Diameter (in.): 70

NYTMN (km.): 4768.586

NYTME (km.): 595.434

Building: 9

**Item 34.2:**

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

Emission Unit: U-PRESS



Emission Point: 00005			
Height (ft.): 50	Length (in.): 40	Width (in.): 18	
NYTMN (km.): 4768.51	NYTME (km.): 595.286	Building: 1	
Emission Point: 00008			
Height (ft.): 45	Length (in.): 27	Width (in.): 30	
NYTMN (km.): 4768.51	NYTME (km.): 595.286	Building: 1	
Emission Point: 00009			
Height (ft.): 45	Length (in.): 27	Width (in.): 30	
NYTMN (km.): 4768.501	NYTME (km.): 595.224	Building: 3	
Emission Point: 00010			
Height (ft.): 45	Length (in.): 26	Width (in.): 26	
NYTMN (km.): 4768.542	NYTME (km.): 595.208	Building: 3	
Emission Point: 00018			
Height (ft.): 45	Length (in.): 36	Width (in.): 18	
NYTMN (km.): 4768.51	NYTME (km.): 595.286	Building: 1	
Emission Point: 00019			
Height (ft.): 50	Length (in.): 36	Width (in.): 24	
NYTMN (km.): 4768.432	NYTME (km.): 595.263	Building: 9	
Emission Point: 00020			
Height (ft.): 45	Length (in.): 36	Width (in.): 18	
NYTMN (km.): 4768.481	NYTME (km.): 595.251	Building: 9	

**Item 34.3:**

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

Emission Unit: U-TRIMS

Emission Point: 00101			
Height (ft.): 40	Diameter (in.): 30		
NYTMN (km.): 4768.405	NYTME (km.): 595.201	Building: 1	
Emission Point: 00102			
Height (ft.): 34	Diameter (in.): 30		
NYTMN (km.): 4768.405	NYTME (km.): 595.222	Building: 1	
Emission Point: 00103			
Height (ft.): 31	Diameter (in.): 24		
NYTMN (km.): 4768.389	NYTME (km.): 595.193	Building: 3	
Emission Point: 00105			
Height (ft.): 31	Length (in.): 34	Width (in.): 34	
NYTMN (km.): 4768.378	NYTME (km.): 595.209	Building: 2	
Emission Point: 00106			
Height (ft.): 31	Diameter (in.): 24		



NYTMN (km.): 4768.394 NYTME (km.): 595.238 Building: 4

Emission Point: 00107  
Height (ft.): 33 Diameter (in.): 24  
NYTMN (km.): 4768.402 NYTME (km.): 595.209 Building: 5

Emission Point: 00108  
Height (ft.): 41 Diameter (in.): 60  
NYTMN (km.): 4768.402 NYTME (km.): 595.219 Building: 6 - EAST

**Condition 35: Process Definition By Emission Unit**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 35.1:**

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

Emission Unit: U-CRTOS  
Process: PR2 Source Classification Code: 4-05-004-11  
Process Description:

Heatset, web offset lithographic printing where a non-photochemically reactive, low vapor pressure offset ink is applied to paper. The ink is dried by direct, high velocity, hot air impingement driers which drive off approximately 85% of the ink solvent (35% of the ink volume). All presses are ducted to a bank of three (3) regenerative thermal oxidizers (RTOs).

Emission Source/Control: CA021 - Control  
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: CA022 - Control  
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: CA023 - Control  
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 00M68 - Process

Emission Source/Control: 00M76 - Process

Emission Source/Control: 00M78 - Process

Emission Source/Control: 00M79 - Process

Emission Source/Control: 00M85 - Process



Emission Source/Control: 0M110 - Process

Emission Source/Control: 0M121 - Process

**Item 35.2:**

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

Emission Unit: U-PRESS

Process: PRN

Source Classification Code: 4-05-004-11

Process Description:

Heatset, web offset lithographic printing where a non-photochemically reactive, low vapor pressure offset ink is applied to paper. The ink is dried by direct, high velocity, hot air impingement driers which drive off approximately 85% of the ink solvent (35% of the ink volume). The following is a summary of the emission source, control equipment emission point configuration and control type:

Press Equip EP Control is

ID ID ID  
Catalytic (C) or

Non-Catalytic(D)

00M35-->CA005-->00  
005-->C  
00M57-->CA008-->00  
008-->C  
00M60-->CA009-->00  
009-->C  
00M61-->CA010-->00  
010-->C  
00M81-->CA014-->00  
010-->C  
0M20B-->CA017-->00  
010-->C  
00M87-->CA019-->00  
019-->D  
00M95-->CA018-->00  
018-->D  
00M99-->CA020-->00020-->D

Emission Source/Control: CA005 - Control  
Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: CA008 - Control  
Control Type: CATALYTIC AFTERBURNER



Emission Source/Control: CA009 - Control  
Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: CA010 - Control  
Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: CA018 - Control  
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: CA019 - Control  
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: CA020 - Control  
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 00M20 - Process

Emission Source/Control: 00M35 - Process

Emission Source/Control: 00M57 - Process

Emission Source/Control: 00M60 - Process

Emission Source/Control: 00M61 - Process

Emission Source/Control: 00M81 - Process

Emission Source/Control: 00M87 - Process

Emission Source/Control: 00M95 - Process

Emission Source/Control: 00M99 - Process

**Item 35.3:**

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

Emission Unit: U-TRIMS

Process: TRM

Source Classification Code: 4-05-004-01

Process Description:

Paper trimmed in the printing and bindery operations is conveyed by an induced draft air handling system to a network of cyclone separators. The cyclones collect waste paper, which is transferred to bailers for shipment to waste paper recyclers, and emit waste paper particulate which consists of fiber, fillers, dry coatings and dry ink. Two of the emission points, 00102 and 00106, have additional emission control in which fine particulates are removed from the air stream by baghouse fabric filters, downstream of the cyclones, prior to exhausting to the

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atmosphere. The bags are 16 ounce singed polyester felt with 50 micron initial mesh size. The air loading is 10 cfm per square foot. The following is a summary of the control equipment and emission point configuration for the Trim collection system process fans "OFANS":

Control ID	EP ID
Cyclone #4, OS101----->	00101
Baghouse #3, OS102----->	00102
Cyclone #5, OS103----->	00103
Cyclone #7, OS105----->	00105
Baghouse #8, OS106----->	00106
Cyclone #9, OS107----->	00107
Baghouse #10, OS108----->	00108

Emission Source/Control: OS101 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: OS102 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: OS103 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: OS105 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: OS106 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: OS107 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: OS108 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: OFANS - Process

**Condition 36: dryer control requirements**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 36.1:**  
This Condition applies to Emission Unit: U-CRTOS

**Item 36.2:**  
The air cleaning device shall provide for a reduction in volatile organic emissions from the dryer exhaust of at least 90 percent.



**Condition 37: control requirement**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 37.1:**

This Condition applies to Emission Unit: U-CRTOS

**Item 37.2:**

If an air cleaning device is used, continuous monitors of the following parameters shall be installed, periodically calibrated and operated at all times that the associated control equipment is operating:

- (a) exhaust gas temperature of all incinerators;
- (b) temperature rise across catalytic incinerator bed;
- (c) breakthrough of volatile organic compounds on a carbon adsorption unit;

and

(d) any other continuous monitoring or recording device required by the commissioner.

**Condition 38: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:6 NYCRR 234.6**

**Item 38.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-CRTOS

**Item 38.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following work practices are prohibited:

- (a) using open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or ink/coating removal;
- (b) storage in open containers of spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;
- (c) use of open containers to store or dispose of inks and/or surface coatings; or
- (d) use of open containers to store or dispense inks



and/or surface coatings 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 should 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: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2010.

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

**Condition 39: dryer control requirements**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 39.1:**  
This Condition applies to Emission Unit: U-PRESS

**Item 39.2:**  
The air cleaning device shall provide for a reduction in volatile organic emissions from the dryer exhaust of at least 90 percent.

**Condition 40: control requirement**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 40.1:**  
This Condition applies to Emission Unit: U-PRESS

**Item 40.2:**  
If an air cleaning device is used, continuous monitors of the following parameters shall be installed, periodically calibrated and operated at all times that the associated control equipment is operating:

- (a) exhaust gas temperature of all incinerators;
- (b) temperature rise across catalytic incinerator bed;



- (c) breakthrough of volatile organic compounds on a carbon adsorption unit;  
and
- (d) any other continuous monitoring or recording device required by the commissioner.

**Condition 41: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement: 6 NYCRR 234.6**

**Item 41.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PRESS

**Item 41.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following work practices are prohibited:

- (a) using open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or ink/coating removal;
- (b) storage in open containers of spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;
- (c) use of open containers to store or dispose of inks and/or surface coatings; or
- (d) use of open containers to store or dispense inks and/or surface coatings 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 should 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: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 8/29/2010.  
Subsequent reports are due every 6 calendar month(s).

**Condition 42: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Item 42.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-TRIMS

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 42.2:**  
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 having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 8/29/2010.  
Subsequent reports are due every 6 calendar month(s).

**Condition 43: Compliance Certification**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Item 43.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-TRIMS





**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 44: Contaminant List**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 44.1:**  
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 45: Unavoidable noncompliance and violations**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

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

**Item 45.1:**

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.

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(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 46: Air pollution prohibited**  
**Effective between the dates of 03/26/2010 and 03/25/2015**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 46.1:**

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.

