

New York State Department of Environmental Conservation
Facility DEC ID: 7502400049



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 7-5024-00049/00007
Effective Date: 11/03/2004 Expiration Date: No expiration date

Permit Issued To: VANGUARD PRINTING LLC
17 HALLWOODS RD
ITHACA, NY 14850

Facility: VANGUARD PRINTING LLC
17 HALLWOODS RD & ST RTE 13
DRYDEN, NY 13053

Description:

printing presses for
producing magazines, catalogs, brochures and similar products. The volatile organic compound
ty also consists of
uding combustion
ellaneous material
handling operation.

ial to emit volatile
organic compounds and hazardous air pollutants to below major source applicability thresholds, and
therefore, the facility is not subject to Title V permitting.

strict compliance
with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions
included as part of this permit.

Permit Administrator: MICHAEL K BARYLSKI
DIVISION OF ENVIRONMENTAL PERMITS
1285 FISHER AVE
CORTLAND, NY 13045-1090

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 7
SUBOFFICE



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:

asonable 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:

ring an inspection
to the permit area when requested by the Department.

Item 1.3:

must be available
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:

idify, supersede or
rms, conditions or
requirements contained in such order or determination.

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

Item 3.1:

al, 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:

ermits for Title V
Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

ited by the statute,
ted prior to actual

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transfer of ownership.

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

Item 4.1:

ce 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 Applications for Permit Modification or Renewal -REGION 7
SUBOFFICE
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 7 Sub-office
Division of Environmental Permits
1285 Fisher Avenue
Cortland, NY 13045-1090
(607) 753-3095



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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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17 HALLWOODS RD
ITHACA, NY 14850

Facility: VANGUARD PRINTING LLC
17 HALLWOODS RD & ST RTE 13
DRYDEN, NY 13053

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

Permit Effective Date: 11/03/2004

Permit Expiration Date: No expiration date.



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 234.4(b)(3): Compliance Demonstration
- 2 6NYCRR 234.5(a): Prohibition of Sale or Specification
- 3 6NYCRR 234.6: Handling, storage, and disposal of volatile organic compounds

Emission Unit Level

EU=0-00001

- 4 6NYCRR 234.3(b)(2): Compliance Demonstration
- 5 6NYCRR 234.3(b)(3): Compliance Demonstration
- 6 6NYCRR 234.3(e): control requirement
- 7 6NYCRR 234.4(a): control requirement
- 8 6NYCRR 234.4(b)(1): control requirement
- 9 6NYCRR 234.4(b)(2): control requirement
- 10 6NYCRR 234.4(b)(4): sampling
- 11 6NYCRR 234.4(c): control requirement

EU=0-00002

- 12 6NYCRR 212.6(a): Compliance Demonstration

EU=0-00002,EP=00002

- 13 6NYCRR 212.4(c): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 14 ECL 19-0301: Contaminant List
- 15 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 16 6NYCRR 201-5: Emission Unit Definition
- 17 6NYCRR 201-5.4(b): Compliance Demonstration
- 18 6NYCRR 201-7: Facility Permissible Emissions
- *19 6NYCRR 201-7: Capping Monitoring Condition
- *20 6NYCRR 201-7: Capping Monitoring Condition
- *21 6NYCRR 201-7: Capping Monitoring Condition
- 22 6NYCRR 211.2: Air pollution prohibited
- 23 6NYCRR 212.4(b): Compliance Demonstration

Emission Unit Level

- 24 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 25 6NYCRR 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 - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

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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 - 6NYCRR Part 201-1.2

If an existing emission source was subject to the permitting requirements of 6NYCRR 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 - 6NYCRR Part 201-1.5

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event



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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 - 6NYCRR Part 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 - 6NYCRR Part 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 Part 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 Part 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



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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 Part 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 6NYCRR Part 202-1.

Item K: Visible Emissions Limited - 6 NYCRR Part 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 - 6 NYCRR Part 215

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

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



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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: Compliance Demonstration

Effective between the dates of 11/03/2004 and Permit Expiration Date

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

Item 1.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, usage and/or production records of inks, VOC and solvents must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the Department's representative. In addition, any other information



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required to determine compliance with 6NYCRR Part 234 must be provided to the Commissioner's representative in a format acceptable to him or her. Records must be maintained at the facility for a period of five years.

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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2: Prohibition of Sale or Specification
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.5(a)

Item 2.1:

No person shall sell, specify, or require for use, the application of a coating or ink on a substrate at a facility with a printing process subject to the volatile organic compound control requirements of 6 NYCRR Part 234 if such use is prohibited by any of the provisions of this Part. The prohibition of this section shall apply to all written or oral contracts under the terms of which any coating or ink is to be applied to any substrate at any affected facility. This prohibition shall not apply to the following:

(1) coatings and/or inks utilized at printing processes where control equipment has been installed to achieve compliance;

(2) coatings and/or inks utilized at printing processes that have been granted variances for reasons of technological and economic feasibility.

Condition 3: Handling, storage, and disposal of volatile organic compounds
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.6



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Item 3.1:

No owner or operator of a facility subject to 6NYCRR Part 234 shall:

- (a) use 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) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;
- (c) use open containers to store or dispose of inks and/or surface coatings; or
- (d) use 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.

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

Condition 4: Compliance Demonstration
Effective between the dates of 11/03/2004 and Permit Expiration Date

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

Item 4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

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

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Any owner or operator of an offset lithographic printing process subject to 6NYCRR Part 234 and employing fountain solutions containing volatile organic compounds shall not operate, cause, allow, or permit the operation of such process unless one of the control strategies specified in Part 234.3(b) are employed. Continuing compliance shall be verified by maintaining records of formulation data as specified in 6 NYCRR §234.4(b)(2) and (3). These records shall contain the following information:

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1. Certification from the fountain solution supplier/manufacture which verifies the composition of the fountain solution solvent/volatiles, if supported by actual batch records,
2. Purchase, usage, and/or production records of the fountain solutions and solvents.
3. Any other parameters used to verify compliance.

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

For presses in operation on or after September 1, 1988, where the control strategy is to use low-VOC fountain solution, the fountain solution must contain 10 percent by weight or less of VOC.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FOUNTAIN SOLUTION

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 10 percent by weight

Reference Test Method: Method 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Compliance Demonstration
Effective between the dates of 11/03/2004 and Permit Expiration Date

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

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The air cleaning device shall provide for a reduction in volatile organic emissions from the printing press dryer exhausts of at least 90 percent.

An approved performance test conducted September 11, 2001 demonstrated compliance with this requirement (a minimum destruction efficiency of 94 percent was achieved during testing while the incinerator was operating at a minimum average combustion chamber temperature of 1600 degrees Fahrenheit). The average temperature of the combustion chamber shall not fall below the minimum average temperature at which compliance with Part 234 has been demonstrated by the most recent approved performance test.

The combustion chamber temperature shall be continuously monitored and recorded during all printing press operations.

A summary of these records shall be included with the annual capping certification report submitted in accordance with 6 NYCRR 201-7.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1600 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 12/02/2005 for the period 11/03/2004 through 11/02/2005

Condition 6: control requirement
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 6.1:

This Condition applies to Emission Unit: 0-00001

Item 6.2:

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 6 NYCRR Part 234.

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Condition 7: control requirement
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(a)

Item 7.1:

This Condition applies to Emission Unit: 0-00001

Item 7.2:

When a printing process utilizes control equipment to comply with the provisions 6NYCRR Part 234, test methods acceptable to the Department must be used when demonstrating the overall removal efficiency.

(a) This demonstration may be performed by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control technique.

(b) For control equipment other than VOC/solvent recovery, this demonstration must include provisions to determine both the efficiency of the capture system and of the subsequent destruction and/or removal of these air contaminants by control equipment prior to their release to the atmosphere.

Condition 8: control requirement
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(b)(1)

Item 8.1:

This Condition applies to Emission Unit: 0-00001

Item 8.2:

The owner or operator must follow notification requirements, protocol requirements and test procedures of 6NYCRR Part 202 for testing and monitoring. Depending upon the conditions at a test site, one of the following test methods from Appendix A of 40 CFR 60 must be used when measuring volatile organic compound (VOC) concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

(a) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography,

(b) Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon,

(c) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

(d) Methods not listed above must be approved in advance by the commissioner's representative and the United States Environmental Protection Agency.



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Condition 9: control requirement
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(b)(2)

Item 9.1:

This Condition applies to Emission Unit: 0-00001

Item 9.2:

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings and printing inks are presented in Appendix A, methods 24 and 24A respectively, of 40 CFR 60. Alternate analytical methods for surface coating and printing ink analysis must be approved by the commissioner and the USEPA. Instead of an ink solvent/volatile analysis, the commissioner may accept certification from the ink manufacturer of the composition of the ink solvent/volatiles, if supported by actual batch records.

Condition 10: sampling
Effective between the dates of 11/03/2004 and Permit Expiration Date

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

Item 10.1:

This Condition applies to Emission Unit: 0-00001

Item 10.2:

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

Condition 11: control requirement
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(c)

Item 11.1:

This Condition applies to Emission Unit: 0-00001

Item 11.2:

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.

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Condition 12: Compliance Demonstration

Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00002

Item 12.2:

Compliance Demonstration 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.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal and in compliance with section 212.6(a) are detected (this may be zero percent opacity for many or all emission sources), the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in 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

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corrective actions will be kept on-site in a format acceptable to the Department. A summary of these records shall be included with the annual capping certification report submitted in accordance with 6 NYCRR 201-7.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: WEEKLY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 12 calendar month(s).

Condition 13: Compliance Demonstration
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00002 Emission Point: 00002

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

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

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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 - 6NYCRR Part 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

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law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 14: Contaminant List

Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 14.1:

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

CAS No: 000107-21-1

Name: 1,2-ETHANEDIOL

CAS No: 000123-31-9

Name: 1,4-BENZENEDIOL

CAS No: 000098-82-8

Name: BENZENE, (1-METHYLETHYL)

CAS No: 007440-48-4

Name: COBALT

CAS No: 000111-42-2

Name: ETHANOL, 2,2'-IMINOBIS-

CAS No: 000111-76-2

Name: ETHANOL, 2-BUTOXY-

CAS No: 000112-07-2

Name: ETHANOL, 2-BUTOXY-, ACETATE

CAS No: 000050-00-0

Name: FORMALDEHYDE

CAS No: 0NY100-00-0

Name: HAP

CAS No: 007439-96-5

Name: MANGANESE

CAS No: 000067-56-1

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Name: METHYL ALCOHOL

CAS No: 000078-93-3

Name: METHYL ETHYL KETONE

CAS No: 000091-20-3

Name: NAPHTHALENE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

CAS No: 001330-20-7

Name: XYLENE, M, O & P MIXT.

Condition 15: Unavoidable noncompliance and violations
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 15.1:

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



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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 16: Emission Unit Definition
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 16.1:

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

Emission Unit: 0-00001

Emission Unit Description:

EMISSIONS FROM WEB PRESSES #429, #438,
#445, #458, AND #465 ARE VENTED TO A
THERMAL OXIDIZER PRIOR TO ENTERING THE
ATMOSPHERE.

Building(s): 1

Item 16.2:

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

Emission Unit: 0-00002

Emission Unit Description:

PAPER WASTE BALING OPERATION.

Building(s): 1

Condition 17: Compliance Demonstration
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5.4(b)

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Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility:

Additional chemicals and /or formulations, or increases in existing chemicals and/or formulations, that meet the following criteria may also be used at the facility.

1. The owner or operator shall maintain a log of all chemicals and formulations used at the facility.
2. Each chemical and/or formulation, shall be evaluated prior to use and comply this condition for operational flexibility.
3. Prior to any proposed changes or modifications the owner or operator shall identify all potential pollutants, including A-rated contaminants, hazardous air pollutants (HAPs), volatile organic compounds (VOCs), and non-VOC pollutants, and the corresponding emission rates that will occur as a result of the proposed changes or modifications. A-rated contaminants are those contaminants listed with a "high" toxicity in the Department's most recent DAR -1 (formerly Air Guide 1) guidance document, and any other contaminants that may be A-rated by the Department;
4. Non-VOC pollutants, which are not A-rated, shall be assigned an environmental rating of "B";
5. Application of the formulations will not result in the emission of any A-rated contaminant with an emission rate potential equal to or greater than 1.0 pound/hr;
6. Application of the formulations will not result in the emission of any non-A rated, non-VOC contaminant with an emission rate potential equal to or greater than 10.0 pounds/hr;
7. The emission of any contaminant shall not cause an off-site ambient concentration in excess of the Annual

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Guideline Concentration (AGC) and/or Short Term Guideline Concentration (SGC), established in the Department's most recent DAR-1 guidance document, for each contaminant emitted;

8. A facility wide DAR-1 (Air Guide 1) analysis must be completed that demonstrates there are no predicted off-site ambient concentration in excess of the AGC or SGC for each contaminant.

9. Certain changes which meet the criteria under (i) - (iii) below may be conducted without prior approval of the Department and shall not require modification of the permit. The facility owner and/or operator must however maintain records of the date and description of such changes and make such records available for review by Department representatives upon request.

(i) Changes that do not cause emissions to exceed any emission limitation contained in regulations or applicable requirements under 6 NYCRR.

(ii) Changes which do not cause the subject emission unit, emission source, process, or emission point to become subject to any additional regulations or requirements under 6 NYCRR.

(iii) Changes that do not seek to establish or modify a federally-enforceable emission cap or limit.

10. In addition to the record keeping required above, the permittee must notify the Department in writing at least 30 calendar days in advance of making changes involving:

(i) the installation or relocation of any emission unit, emission source, process, or emission point within a facility;

(ii) the emission of any air pollutant not previously authorized or emitted in accordance with a permit issued by the Department;

(iii) the installation or alteration of any air cleaning installation, device or

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control equipment.

11. The Department may require a permit modification, in order to impose applicable requirements or special permit conditions if it determines that changes proposed pursuant to notification under (10) above do not meet the criteria under (9) above or the change may have a significant air quality impact. In such cases the Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the change for air quality impacts and/or applicable requirements. The Department shall respond to the permittee in writing with such a determination within 15 days of receipt of the 30 day advance notification from the permittee. The Department's determination shall include a listing of information necessary to further review the proposed change.

12. A summary of all activities conducted under this operational flexibility shall be reported in the facility's annual emissions cap certification submitted pursuant to 6 NYCRR Part 201-7.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 12/02/2005 for the period 11/03/2004 through 11/02/2005

Condition 18: Facility Permissible Emissions
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 18.1:

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: 000067-56-1 PTE: 19,999 pounds per year
Name: METHYL ALCOHOL

CAS No: 000078-93-3 PTE: 19,999 pounds per year
Name: METHYL ETHYL KETONE

CAS No: 000091-20-3 PTE: 19,999 pounds per year
Name: NAPHTHALENE



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CAS No: 000098-82-8 PTE: 19,999 pounds per year
Name: BENZENE, (1-METHYLETHYL)

CAS No: 000107-21-1 PTE: 19,999 pounds per year
Name: 1,2-ETHANEDIOL

CAS No: 000111-42-2 PTE: 19,999 pounds per year
Name: ETHANOL, 2,2'-IMINOBIS-

CAS No: 000111-76-2 PTE: 20,000 pounds per year
Name: ETHANOL, 2-BUTOXY-

CAS No: 000112-07-2 PTE: 19,999 pounds per year
Name: ETHANOL, 2-BUTOXY-, ACETATE

CAS No: 000123-31-9 PTE: 19,999 pounds per year
Name: 1,4-BENZENEDIOL

CAS No: 001330-20-7 PTE: 19,999 pounds per year
Name: XYLENE, M, O & P MIXT.

CAS No: 007439-96-5 PTE: 19,999 pounds per year
Name: MANGANESE

CAS No: 007440-48-4 PTE: 19,999 pounds per year
Name: COBALT

CAS No: 0NY100-00-0 PTE: 49,999 pounds per year
Name: HAP

CAS No: 0NY998-00-0 PTE: 99,999 pounds per year
Name: VOC

Condition 19: Capping Monitoring Condition
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 19.1:

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:

6NYCRR 201-6.1(a)

Item 19.2:



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Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 19.3:

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 19.4:

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 19.5:

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 19.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 19.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility has chosen to limit (cap) the potential to emit emissions of Volatile Organic Compounds (VOCs) to below the major source, Title V, permitting threshold of 50 tons per year. Total facility emissions of Volatile Organic Compounds (VOCs), as defined in 6 NYCRR Part 200, shall not equal or exceed 50 tons in any consecutive 12 month period (annual maximum rolled monthly).

Compliance with this emission limit (cap) is required for the facility to remain non-applicable to Title V permitting. Verification of monthly and annual VOC emissions shall be determined using compliance



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demonstration methods acceptable to the Department. A summary of emissions shall be included in the facility's annual emissions cap certification submitted pursuant to 6 NYCRR Part 201-7.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: MATERIAL
Parameter Monitored: VOC
Upper Permit Limit: 50 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (ANNIVERSARY)
Initial Report Due: 12/02/2005 for the period 11/03/2004 through 11/02/2005

Condition 20: Capping Monitoring Condition
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 20.1:

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:

6NYCRR 201-6.1(a)

Item 20.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 20.3:

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 20.4:

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 20.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for

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which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 20.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 20.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility has chosen to limit (cap) the potential to emit emissions of total Hazardous Air Pollutants (HAPs) to below the major source, Title V, permitting threshold of 25 tons per year. Total facility emissions of Hazardous Air Pollutants (HAPs), as defined in 6 NYCRR Part 200, shall not equal or exceed 25 tons in any consecutive 12 month period (annual maximum rolled monthly).

Compliance with this emission limit (cap) is required for the facility to remain non-applicable to Title V permitting. Verification of monthly and annual HAP emissions shall be determined using compliance demonstration methods acceptable to the Department. A summary of emissions shall be included in the facility's annual emissions cap certification submitted pursuant to 6 NYCRR Part 201-7.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: MATERIAL

Parameter Monitored: HAP

Upper Permit Limit: 25 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 12/02/2005 for the period 11/03/2004 through 11/02/2005

Condition 21: Capping Monitoring Condition
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

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Item 21.1:

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:

6NYCRR 201-6.1(a)

Item 21.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 21.3:

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 21.4:

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 21.5:

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 21.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000067-56-1	METHYL ALCOHOL
CAS No: 000078-93-3	METHYL ETHYL KETONE
CAS No: 000091-20-3	NAPHTHALENE
CAS No: 000107-21-1	1,2-ETHANEDIOL
CAS No: 000111-42-2	ETHANOL, 2,2'-IMINOBI-
CAS No: 000111-76-2	ETHANOL, 2-BUTOXY-
CAS No: 000112-07-2	ETHANOL, 2-BUTOXY-, ACETATE
CAS No: 000123-31-9	1,4-BENZENEDIOL
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 007439-96-5	MANGANESE
CAS No: 007440-48-4	COBALT
CAS No: 000098-82-8	BENZENE, (1-METHYLETHYL)

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Item 21.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility has chosen to limit (cap) the potential to emit emissions of individual Hazardous Air Pollutants (HAPs) to below the major source, Title V, permitting threshold of 10 tons per year. Facility emissions of any individual Hazardous Air Pollutant, as defined in 6 NYCRR Part 200, shall not equal or exceed 10 tons in any consecutive 12 month period (annual maximum rolled monthly).

Any HAP, not listed above, added and emitted from the facility as a result of operational flexibility pursuant to 6 NYCRR Part 201-5.4(b) shall also comply with the individual HAP limitation of less than 10 tons in any consecutive 12 month period.

Compliance with this emission limit (cap) is required for the facility to remain non-applicable to Title V permitting. Verification of monthly and annual HAP emissions shall be determined using compliance demonstration methods acceptable to the Department. A summary of emissions shall be included in the facility's annual emissions cap certification submitted pursuant to 6 NYCRR Part 201-7.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: MATERIAL

Parameter Monitored: HAP

Upper Permit Limit: 10 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 12/02/2005 for the period 11/03/2004 through 11/02/2005

Condition 22: Air pollution prohibited
Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 22.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity,



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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.

Condition 23: Compliance Demonstration

Effective between the dates of 11/03/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 212.4(b)

Item 23.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission unit 0-00001 emits formaldehyde, an "A" rated contaminant, at a rate less than 1 lbs/hr. Table 2 of 6 NYCRR Part 212.9(b) specifies that for "A" rated contaminants with an emission rate potential (ERP) less than 1 lbs/hr, the degree of air cleaning required shall be specified by the commissioner. The most recent data indicates less than 1 lb/yr actual facility wide emissions. At this emission rate(s) and stack height(s), expected offsite ambient concentrations are below the existing annual guideline concentration (AGC) and short-term guideline concentration (SGC) established by the Department's DAR-1 guidance document. Based on facility wide impacts at the current emission rate and stack heights, no air cleaning (control) for this contaminant is required at this time. Should new information become available that results in a decision by DEC that lower ambient concentrations and emissions of this contaminant are necessary, the Department may require control of this contaminant.

Facility wide emissions of formaldehyde shall not equal or exceed 1 pound in any consecutive 12 month period (annual maximum rolled monthly). An increase in emissions to greater than 1 pound in any consecutive 12 month period and /or a change in the stack height(s) are operational



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changes subject the permit condition for Operational Flexibility, pursuant to 6 NYCRR 201-5.4(b), contained elsewhere in this permit.

Formaldehyde emissions shall be included in the facility's monthly emission determinations and a summary of emissions shall be included in the facility's annual capping certification.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 12/02/2005 for the period 11/03/2004 through 11/02/2005

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

**Condition 24: Emission Point Definition By Emission Unit
Effective between the dates of 11/03/2004 and Permit Expiration Date**

Applicable State Requirement: 6NYCRR 201-5

Item 24.1:

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

Emission Unit: 0-00001

Emission Point: 00001

Height (ft.): 45 Diameter (in.): 37
NYTMN (km.): 4702.8 NYTME (km.): 384.1 Building: 1

Item 24.2:

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

Emission Unit: 0-00002

Emission Point: 00002

Height (ft.): 34 Length (in.): 30 Width (in.): 30
NYTMN (km.): 4702.8 NYTME (km.): 384.1 Building: 1

**Condition 25: Process Definition By Emission Unit
Effective between the dates of 11/03/2004 and Permit Expiration Date**

Applicable State Requirement: 6NYCRR 201-5

Item 25.1:

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

Emission Unit: 0-00001

Process: 001

Source Classification Code: 4-05-004-01

Process Description:

EMISSIONS FROM WEB PRESSES #429, #438,
#445, #458, AND #465 ARE VENTED TO A
REGENERATIVE THERMAL OXIDIZER PRIOR TO
ENTERING THE ATMOSPHERE.

Emission Source/Control: THEOX - Control

Control Type: DIRECT FLAME AFTERBURNER WITH HEAT
EXCHANGER

Emission Source/Control: 00429 - Process

Emission Source/Control: 00438 - Process

Emission Source/Control: 00445 - Process

Emission Source/Control: 00458 - Process

Emission Source/Control: 00465 - Process

Item 25.2:

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

Emission Unit: 0-00002

Process: 002

Source Classification Code: 3-07-013-99

Process Description: PAPER WASTE BALING OPERATION.

Emission Source/Control: BALE1 - Control

Control Type: FABRIC FILTER

Emission Source/Control: BALER - Process