



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1402-00795/00003
Mod 0 Effective Date: 11/03/2000 Expiration Date: No expiration date.
Mod 1 Effective Date: 01/18/2006 Expiration Date: No expiration date.
Mod 2 Effective Date: 06/10/2013 Expiration Date: No expiration date.

Permit Issued To: BUFFALO NEWSPRESS INC
P O BOX 648
BUFFALO, NY 14240-0648

Contact: JAMES P BURKE
BUFFALO NEWSPRESS INC
PO BOX 648
BUFFALO, NY 14240-0648
(716) 852-1600

Facility: BUFFALO NEWSPRESS INC
200 BROADWAY
BUFFALO, NY 14204

Description:

AIR STATE FACILITY PERMIT DESCRIPTION
BUFFALO NEWSPRESS
DEC I.D. NO. 9140200795
MOD 2

Buffalo Newspress, located at 200 Broadway Avenue in Buffalo, New York, operates commercial web offset lithographic printing presses for publications and advertising supplements. The facility emits volatile organic compounds (VOCs), including hazardous air pollutants (HAPs), which are contained in the inks, fountain solution (used in the printing process), blanket solution (used to clean the presses), developers and cleaners. The facility operates 24 hours per day, 365 days per year in a moderate nonattainment area for ozone. The Standard Industrial Classification Code for Buffalo Newspress is 2752 - Commercial Printing, Lithographic.

All printing operations at Buffalo Newspress are contained in Emission Unit (EU) A-00001. Currently the facility operates five 4-color web offset lithographic printing presses, utilizing cold-set ink with all the presses, identified as Process 001. Three of these presses can also use heat-set inks. The operation of presses and associated negative pressure dryers with heat-set inks, followed by control of dryer emissions by regenerative thermal oxidizers (RTOs) is identified as Process 002. All RTOs are required to operate at a minimum combustion zone temperature of 1500 degrees Fahrenheit (F), which must be



continuously monitored and recorded. This minor permit modification allows for the installation of a new Harris N946II – 4 unit web offset lithographic printing press and TEC dryer for use with heat-set inks, identified as Emission Source (ES) 00012. VOC and HAP emissions from the dryer will be controlled by a new continuously monitored TANN RTO, identified as Emission Source Control (ESC) 00011. The TANN RTO will be operated at a minimum temperature of 1500 degrees F. Emissions from the RTO are exhausted through Emission Point (EP) 00008. The new press can also be operated with cold-set inks. When cold-set inks are used emissions are fugitive and are exhausted through general ventilation roof vents, identified as EPs 00002, 00003, 00004 and 00005.

In early 2008, Buffalo Newspress submitted an application for a permit modification for the installation of a new Heidelberg V30, 8-color heat-set press (ES 00010) and the relocation of two Atlas dryers and the Airex/Adwest RTO (ESC 00009) to the new press from an existing heat-set press (ES 00004). The new press was associated with EP 00007. The facility requested that this modification be conducted under operational flexibility, which was approved by the Department in accordance with 6NYCRR 201-5. The modification included the addition of ES 00010, associated with ESC 00009 and EP 00007.

The applicable requirements specified under 6NYCRR234: Graphic Arts were also added to the Air State Facility (AFS) permit as part of this modification. Buffalo Newspress became subject to these requirements when Part 234 was amended in 2010, at which time Buffalo Newspress could no longer avoid this requirement by capping emissions below 50 tons per year. Buffalo Newspress complies with Part 234 for the heat-set web offset lithographic printing process by meeting the overall removal efficiency requirement of 95% for new presses that have a potential to emit (PTE) VOC of 25 tons per year or more. All of the RTOs will meet an overall removal efficiency of 95% for use in the calculation of VOC emissions to verify compliance with the 49 tpy limit to avoid Title V requirements. Buffalo Newspress must demonstrate compliance with the overall removal efficiency for all heat-set press/dryers/control systems within one year of the issuance of this permit. Buffalo Newspress also complies with 234.3 (c)(1)(i), which requires that cleaning material, as applied, has a composite vapor pressure of less than or equal to 10 millimeters mercury at 20 degrees Celsius and 234.3 (d)(1), which requires that fountain solution, as applied, contains no more than 5% alcohol substitute by weight and no alcohol. Buffalo Newspress is also subject to other requirements under Part 234, including testing and monitoring, handling, storage and disposal, recordkeeping and an opacity limit.

Buffalo Newspress operates under an ASF with a cap on facility-wide emissions established to limit VOC, total HAP and individual HAPs to below the applicability thresholds which would require a Title V permit. The limit on VOC emissions also allows Buffalo Newspress to avoid the requirements 6NYCRR231: New Source Review for New and Modified Facilities. The facility-wide limits that Buffalo Newspress must comply with are 49 tpy VOCs, 24 tpy total HAPs, and 9 tpy individual HAPs. Buffalo Newspress will continue to operate within the limits of these CAPs and comply with the control, monitoring, maintenance, reporting and recordkeeping requirements specified in this ASF permit.

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.

New York State Department of Environmental Conservation
Facility DEC ID: 9140200795



Permit Administrator: DOUGLAS E BORSCHEL
270 MICHIGAN AVE
BUFFALO, NY 14203-2915

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
 - Applications for Permit Renewals and Modifications
 - Permit modifications, suspensions or revocations by the Department
 - Applications for Permit Renewals and Modifications
 - Permit Modifications, Suspensions and Revocations by the Department
 - Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal
 - REGION 9 HEADQUARTERS
- Submission of Applications for Permit Modification or Renewal
 - REGION 9 SUBOFFICE
- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 2-1: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 2-1.1:

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

Item 2-1.2:

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

Item 2-1.3:

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



Applicable State Requirement: 6 NYCRR 621.13

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3:

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

Condition 2-2: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 2-2.1:

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

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

Condition 3: Applications for Permit Renewals and Modifications

Applicable State Requirement: 6 NYCRR 621.13 (a)

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.

Condition 1-2: Permit Modifications, Suspensions and Revocations by the



Applicable State Requirement: 6 NYCRR 621.14

Item 1-2.1:

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

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

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

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

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

Condition 1-3: Submission of Applications for Permit Modification or Renewal
-REGION 9

HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.5 (a)

Item 1-3.1:

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

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9
SUBOFFICE

Applicable State Requirement: 6 NYCRR 621.5 (a)



Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Sub-office
Division of Environmental Permits
128 South Street
Olean, NY 14760-3632
(716) 372-0645

Condition 2-3: Submission of application for permit modification or renewal-REGION 9

HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 2-3.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-1402-00795/00003

Facility DEC ID: 9140200795



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: BUFFALO NEWSPRESS INC
P O BOX 648
BUFFALO, NY 14240-0648

Facility: BUFFALO NEWSPRESS INC
200 BROADWAY
BUFFALO, NY 14204

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

Mod 0 Permit Effective Date: 11/03/2000
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 01/18/2006
date.

Permit Expiration Date: No expiration

Mod 2 Permit Effective Date: 06/10/2013
date.

Permit Expiration Date: No expiration



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1-2 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 1 6 NYCRR 200.1: Definitions Applicable To This Permit
- 2 6 NYCRR 200.3: False statement
- 2-1 6 NYCRR 200.7: Compliance Demonstration
- 2-2 6 NYCRR 201-7.1: Facility Permissible Emissions
- *2-3 6 NYCRR 201-7.1: Capping Monitoring Condition
- *2-4 6 NYCRR 201-7.1: Capping Monitoring Condition
- *2-5 6 NYCRR 201-7.1: Capping Monitoring Condition
- 2-6 6 NYCRR 211.1: Air pollution prohibited
- 2-7 6 NYCRR 234.1 (c): Once in, always in
- 2-8 6 NYCRR 234.3 (b) (1) (ii): Compliance Demonstration
- 2-9 6 NYCRR 234.3 (c) (1) (ii): Compliance Demonstration
- 2-10 6 NYCRR 234.3 (d) (1): Compliance Demonstration
- 2-11 6 NYCRR 234.4 (a): Compliance Demonstration
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- 2-13 6 NYCRR 234.6: Compliance Demonstration
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STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 1-11 ECL 19-0301: Contaminant List
- 2-16 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 25 6 NYCRR Subpart 201-5: Emission Unit Definition
- 2-17 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 2-18 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 2-19 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 28 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 29 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

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

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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



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

Item F: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

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

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

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

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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



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

Item K: Open Fires Prohibitions - 6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 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.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1-2: Recycling and Emissions Reduction



Effective between the dates of 01/18/2006 and Permit Expiration Date

Applicable Federal Requirement:40CFR 82, Subpart F

Item 1-2.1:

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

Condition 1: Definitions Applicable To This Permit

Effective between the dates of 11/03/2000 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 200.1

Item 1.1:

The definitions found in Parts 200 and 201 apply throughout this permit. Specific definitions used in this permit and their meanings include:

1. "Act" refers to the Federal Clean Air Act, 42 U.S.C. Section 7401, et seq., as amended by Public Law 101-549, November 15, 1990.
2. "Administrator" refers to the Administrator of the United States Environmental Protection Agency or designee.
3. "Department" refers to the New York State Department of Environmental Conservation.

Condition 2: False statement

Effective between the dates of 11/03/2000 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 200.3

Item 2.1:

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 2-1: Compliance Demonstration

Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 200.7

Item 2-1.1:

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

Emission Unit: A-00001
Process: 002

Emission Source: 00007

Emission Unit: A-00001
Process: 002

Emission Source: 00009

Emission Unit: A-00001
Process: 002

Emission Source: 00011

Regulated Contaminant(s):



CAS No: 0NY998-00-0 VOC

Item 2-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Buffalo Newspress operates three Regenerative Thermal Oxidizers (RTOs) (Emission Source Control (ESC) 00007 (Megtec Millennium RTO), ESC 00009 (Airex/Adwest RTO) and ESC 00011 (TANN RTO)), to control VOC, total HAP, and individual HAP emissions from four heat-set web offset lithographic printing presses (Emission Source (ES) 00001, ES 00002, ES 00010 and ES 00012). The use of the RTOs allows Buffalo Newspress to comply with control requirements for VOC emissions specified under 6NYCRR Part 234: Graphic Arts and to maintain VOC, total HAP, and individual HAP emissions below the facility-wide potential to emit limits specified in this permit to avoid the requirements of 6NYCRR201-6, "Title V Facility Permits" and 6NYCRR231, "New Source Review for New and Modified Facilities". The RTOs also enable Buffalo Newspress to maintain contaminant emissions below NYSDEC's short-term (1-hour) and annual guideline concentrations (SGCs and AGCs) for toxic contaminants and to control nuisance odors in accordance with 6NYCRR211.1, "Air Pollution Prohibited". In addition, the RTOs control the opacity of the stack gases emitted from Emission Points 00001, 00007 and 00008 to ensure compliance with the opacity limit of less than 10% specified under 6NYCRR234.8 and the opacity limit of less than 20% specified under 6NYCRR212.6, "Opacity of emissions limited" and 6NYCRR211.2 - "Visible emissions limited" for those emission points.

The owner or operator of any facility which uses air pollution control equipment to comply with an emissions cap or any other requirement must operate and maintain such equipment in a manner consistent with good engineering practices. 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. Buffalo Newspress must follow the procedures specified in their Preventative Maintenance, Operating and Emergency Shutdown Plan, which is included as an addendum to this Air State Facility permit. Recordkeeping and reporting shall be conducted in accordance with the requirements specified in the Plan. Any changes made to the Preventative Maintenance, Operating and Emergency

New York State Department of Environmental Conservation

Permit ID: 9-1402-00795/00003

Facility DEC ID: 9140200795



Shutdown Plan must be approved by the NYSDEC prior to implementation. Manufacturer's Operation and Maintenance Manuals shall also be considered part of this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-2: Facility Permissible Emissions Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 2-2.1:

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:

per year	CAS No: 000078-93-3 (From Mod 2)	PTE: 18,000 pounds
	Name: METHYL ETHYL KETONE	
per year	CAS No: 000098-82-8 (From Mod 2)	PTE: 18,000 pounds
	Name: BENZENE, (1-METHYLETHYL)	
per year	CAS No: 000100-41-4 (From Mod 2)	PTE: 18,000 pounds
	Name: ETHYLBENZENE	
per year	CAS No: 000107-21-1 (From Mod 2)	PTE: 18,000 pounds
	Name: 1,2-ETHANEDIOL	
per year	CAS No: 000108-88-3 (From Mod 2)	PTE: 18,000 pounds
	Name: TOLUENE	
per year	CAS No: 000110-54-3 (From Mod 2)	PTE: 18,000 pounds
	Name: HEXANE	
per year	CAS No: 000111-76-2 (From Mod 2)	PTE: 18,000 pounds
	Name: ETHANOL, 2-BUTOXY-	
per year	CAS No: 000123-31-9 (From Mod 2)	PTE: 18,000 pounds
	Name: 1,4-BENZENEDIOL	
	CAS No: 001330-20-7 (From Mod 2)	PTE: 18,000 pounds



per year

Name: XYLENE, M, O & P MIXT.

per year

CAS No: 0NY100-00-0 (From Mod 2) PTE: 48,000 pounds

Name: HAP

per year

CAS No: 0NY998-00-0 (From Mod 2) PTE: 98,000 pounds

Name: VOC

Condition 2-3: Capping Monitoring Condition
Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 2-3.1:

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 201-6

Item 2-3.2:

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

Item 2-3.3:

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 2-3.4:

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 2-3.5:

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 2-3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 9-1402-00795/00003

Facility DEC ID: 9140200795



CAS No: 000078-93-3	METHYL ETHYL KETONE
CAS No: 000098-82-8	BENZENE, (1-METHYLETHYL)
CAS No: 000100-41-4	ETHYLBENZENE
CAS No: 000107-21-1	1,2-ETHANEDIOL
CAS No: 000108-88-3	TOLUENE
CAS No: 000110-54-3	HEXANE
CAS No: 000111-76-2	ETHANOL, 2-BUTOXY-
CAS No: 000123-31-9	1,4-BENZENEDIOL
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.

Item 2-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Buffalo Newspress has an annual potential to emit (PTE) individual hazardous air pollutants (HAPs) from emission sources throughout the facility, which exceeds the applicability threshold of 10 tons per year (tpy) specified in 6NYCRR201-6 for Title V Facility Permits. Buffalo Newspress has chosen to accept limitations to restrict the amount of individual HAPs emitted from the facility to 9 tpy each based on a 12-month rolling total of facility-wide actual individual HAP emissions. Therefore, the Facility is not subject to the requirements of 6NYCRR201-6: Title V Facility Permits. This monitoring condition shall apply to each individual HAP emitted from the facility that has a PTE equal to or greater than 10 tpy. To verify the applicability of this requirement a current listing of each individual HAP emitted with the corresponding PTE shall be maintained. Calculations and information used to determine the PTEs shall be available for NYSDEC review upon request. The HAPs listed in this monitoring condition are not all inclusive and may change with products and usage rates.

Facility-wide actual emissions of individual HAPs shall not exceed 9 tpy as determined by summing the monthly individual HAP emissions during any consecutive 12-month period from all HAP contributing activities. Emissions shall be determined as follows or in another manner acceptable to NYSDEC and USEPA:

Monthly Total HAPs (lbs/mo) = ER1 + ER2 + ER3 + ER4 + ER5:

COLD-SET INKS:

Emissions from cold-set inks (ER1) may be determined using a 95% retention factor as follows:



ER1 = cold-set ink (new and recycled) usage rate (lbs/mo)
* % indiv HAP Content/100 * 0.05:

HEAT-SET INKS:

When emissions from heat-set inks pass through the RTO at the required minimum operating temperature of 1500 F, without bypass, a 20% retention factor and a 95% overall removal efficiency may be used to determine the total HAP emission rate (ER2) as follows:

ER2 = heat-set ink (new and recycled) usage rate (lbs/mo)
* % indiv HAP Content/100 * 0.8 * 0.05

If for any reason the RTO is operating lower than the required temperature or if the RTO is bypassed, the 95% overall removal efficiency shall not be used to determine individual HAP emissions. The individual HAP emission rate (ER3) shall be based on usage during that time period, the individual HAP content in the inks and a 20% retention factor. The emission rate calculated for this time period shall be added to the monthly emission rate.

ER3 = heat-set ink (new and recycled) usage rate (lbs) * %
indiv HAP Content/100 * 0.8

SOLVENTS (fountain solution, blanket wash, cleaning solvents, etc.), **COATINGS, SEALANTS AND ADHESIVES:**

Emission rate (ER4) shall be calculated assuming 100% loss of individual HAPs contained in these products to the ambient air.

ER4 = solvent/coatings/sealants/adhesives (new and recycled) usage rate (lbs/mo) * % indiv HAP Content/100

OTHER SOURCES OF INDIVIDUAL HAP EMISSIONS (I.E., PREPRESS, EXEMPT&TRIVIAL ACTIVITIES):

ER5 = usage rate (lbs/mo) * % Indiv HAP Content of Product/100

The Facility shall keep and maintain records for each process and other HAP contributing activities to determine actual individual HAP emissions based on verifiable data. These records shall include the following information:

- 1) A current list of all HAP containing products used throughout the facility, including but not limited to, inks, coatings, solvents, sealants and adhesives. This list shall include information on the manufacturer, brand,



product name or code; HAP content in pounds per gallon or percent by weight and density (lb/gallon)/specific gravity; and/or manufacturer's product specifications, material content reports, or laboratory analyses providing this information;

2) A monthly log of the consumption of each solvent (including solvents used in cleanup and surface preparation and any recycled solvents), ink (including recycled waste ink), coating, sealant, adhesive, etc. used;

3) All purchase orders, invoices, repair/maintenance records, usage and production records, control equipment malfunction/repair/maintenance records and other documents to support information in the monthly log; and

4) All calculations used to determine the monthly emissions, including periods of control equipment malfunction, bypass and repair.

To reduce unnecessary HAP emissions to the environment, Buffalo Newspress shall comply with the following handling, storage and disposal requirements for HAP containing compounds: (1) do not use open containers to store or dispose of cloth or paper impregnated with solvents that are used for surface preparation, cleanup or ink/coating removal; (2) do not store spent or fresh solvents to be used for surface preparation, cleanup or ink/coating removal in open containers; (3) do not use open containers to store or dispense inks and/or surface coatings or solvents unless production, sampling, maintenance or inspection procedures require operational access. This does not apply to the actual device or equipment designed for the purpose of applying an ink or a coating to a substrate; and (4) do not use open containers to store or dispose of inks and or surface coatings.

An exceedance of this emission limit, failure to fulfill the recordkeeping and reporting requirements and/or failure to maintain the good work/housekeeping practices specified in this condition constitutes a violation of 6NYCRR201-6. Exceedance of this limit must be reported to the Department immediately via telephone during normal working hours, but no later than 2 business days after the occurrence. A written report shall be submitted to the Department within 30 days of the occurrence and shall include the cause of the exceedance, corrective action taken, contaminants emitted and an estimate of the emissions.

New York State Department of Environmental Conservation

Permit ID: 9-1402-00795/00003

Facility DEC ID: 9140200795



Parameter Monitored: INKS, SOLVENTS AND ADHESIVES

Upper Permit Limit: 9 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 12-month total, rolled monthly

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 2-4: Capping Monitoring Condition
Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 2-4.1:

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 201-6

6 NYCRR Subpart 231-2

Item 2-4.2:

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

Item 2-4.3:

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 2-4.4:

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 2-4.5:

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 2-4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):



CAS No: 0NY998-00-0 VOC

Item 2-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Buffalo Newspress has an annual potential to emit volatile organic compounds (VOCs) from all emission sources throughout the facility, which exceeds the applicability threshold of 50 tons per year (tpy) specified in 6NYCRR201-6 for Title V Facility Permits. Buffalo Newspress has chosen to accept limitations to restrict the amount of VOCs emitted from the facility to 49 tpy and, therefore, is not required to obtain a Title V permit. The need to determine the applicability of 6NYCRR231: New Source Review for New and Modified Facilities for the facility is also eliminated by restricting the potential to emit VOCs to below the major source threshold of 50 tpy.

Facility-wide actual emissions of VOCs shall not exceed 49 tpy as determined by summing the individual monthly total VOC emissions during any consecutive 12-month period from all VOC contributing activities. Emissions shall be determined as follows or in another manner acceptable to NYSDEC and USEPA:

Monthly Total VOCs (lbs/mo) = ER1 + ER2 + ER3 + ER4 + ER5

COLD-SET INKS:

Emissions from cold-set inks (ER1) may be determined using a 95% retention factor as follows:

ER1 = cold-set ink (new and recycled) usage rate (lbs/mo)
* %Total VOC Content of Ink/100 * 0.05

HEAT-SET INKS:

When emissions from heat-set inks pass through the RTO at the required minimum operating temperature of 1500 F, without any bypass, a 20% retention factor and 95% overall removal efficiency may be used to determine the VOC emission rate (ER2) as follows:

ER2 = heat-set ink (new and recycled) usage rate (lbs/mo)
* %Total VOC Content of Ink/100 * 0.8 * 0.05

If for any reason the RTO is operating lower than the required temperature or if the RTO is bypassed, the 95 %



overall removal efficiency shall not be used to determine VOC emissions. The VOC emission rate (ER3) shall be based on usage during that time period, the VOC content in the inks and a 20% retention factor. The emission rate calculated for this time period shall be added to the monthly emission rate.

ER3 = heat-set ink (new and recycled) usage rate (lbs) *
%Total VOC Content of Ink/100 * 0.8

SOLVENTS (fountain solution, blanket wash, cleaning solvents, etc.), COATINGS, SEALANTS AND ADHESIVES: Assume that 100% of the VOCs contained in these products are emitted to the ambient air. Emission rate (ER4) shall be calculated as follows:

ER4 = solvent/coatings/adhesives (new and recycled) usage rate (lbs/mo) * %Total VOC Content of product/100

OTHER SOURCES (I.E., PREPRESS, EXEMPT AND TRIVIAL ACTIVITIES):

ER5 = usage rate (lbs) * %Total VOC Content of Product/100

The Facility shall keep and maintain records for each process and other VOC contributing activities to determine actual total VOC emissions based on verifiable data.

These records shall include the following information:

1) A current list of all VOC containing products used, including but not limited to, inks, coatings, solvents, adhesives, etc. in use throughout the facility. This list shall include information on the manufacturer, brand, product name or code; VOC content in pounds per gallon, or percent by weight and density (lb/gallon); and/or manufacturer's product specifications, material VOC content reports, or laboratory analyses providing this information;

2) A monthly log of the consumption of each solvent (including solvents used in cleanup and surface preparation and any recycled solvents), ink (including recycled waste ink), coating, sealant, adhesive, etc. used;

3) All purchase orders, invoices, repair/maintenance records, usage and production records and other documents/information to support information in the monthly log;



4) All calculations used to determine the monthly emissions, including periods of control equipment malfunction, bypass, and repair; and

(5) a description of equipment used during and after ink/coating/solvent, ink sealant or adhesive application, including type, make and model; maximum design process rate or throughput; a description of the ink/coating/solvent application/drying method(s) employed; and all emission control unit information, including 1) information on emission control equipment type and description, make and model, and emission sources served by the emission control unit, 2) information on emission control equipment design, including where applicable: pollutant(s) controlled; control effectiveness; maximum design or rated capacity; inlet and outlet temperatures; concentrations of each pollutant controlled; heat exchange media (type, material, life, volume, pressure drop operating range, etc.); other design data as appropriate; 3) all emission source test information; and 4) a monthly log of hours of operation including notation of any control equipment breakdowns, upsets, repairs, maintenance and any other deviations from design parameters;

To reduce unnecessary VOC emissions to the environment, Buffalo Newspress shall comply with the handling, storage and disposal requirements for VOC containing compounds as required under 6NYCRR234.6.

An exceedance of this emission limit, failure to fulfill the recordkeeping and reporting requirements and/or failure to maintain the good work/housekeeping practices specified in this condition constitutes a violation of 6NYCRR201-6 and 6NYCRR231. Exceedance of any limit must be reported to the Department immediately via telephone during normal working hours, but no later than 2 business days after the occurrence. A written report shall be submitted to the Department within 30 days of the occurrence and shall include the cause of the exceedance, corrective action taken, contaminants emitted and an estimate of the emissions.

Parameter Monitored: INKS, SOLVENTS AND ADHESIVES

Upper Permit Limit: 49 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12-month total, rolled monthly

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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



Condition 2-5: Capping Monitoring Condition
Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 2-5.1:

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 201-6

Item 2-5.2:

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

Item 2-5.3:

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 2-5.4:

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 2-5.5:

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 2-5.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 2-5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Buffalo Newspress has an annual potential to emit total



hazardous air pollutants (HAPs) from emission sources throughout the facility, which exceeds the applicability threshold of 25 tons per year (tpy) specified in 6NYCRR201-6 for Title V Facility Permits. Buffalo Newspress has chosen to accept limitations to restrict the amount of HAPs emitted from the facility to 24 tpy and, therefore, is not required to obtain a Title V permit.

Facility-wide actual emissions of total HAPs shall not exceed 24 tpy as determined by summing the individual monthly total HAPs emissions during any consecutive 12-month period from all HAP contributing activities. Total facility HAP emissions include all HAPs emitted, even those that do not have a PTE of 10 tpy or greater. Emissions shall be determined as follows or in another manner acceptable to NYSDEC and USEPA:

$$\text{Monthly Total HAPs (lbs/mo)} = \text{ER1} + \text{ER2} + \text{ER3} + \text{ER4} + \text{ER5}$$

COLD-SET INKS:

Emissions from cold-set inks (ER1) may be determined using a 95% retention factor as follows:

$$\text{ER1} = \text{cold-set ink (new and recycled) usage rate (lbs/mo)} \\ * \% \text{ Total HAPs Content}/100 * 0.05$$

HEAT-SET INKS:

When emissions from heat-set inks pass through the RTO at the required minimum operating temperature of 1500 F, without any bypass, a 20% retention factor and a 95% overall removal efficiency may be used to determine the total HAP emission rate (ER2) as follows:

$$\text{ER2} = \text{heat-set ink (new and recycled) usage rate (lbs/mo)} \\ * \% \text{ total HAP Content}/100 * 0.8 * 0.05$$

If for any reason the RTO is operating lower than the required temperature or if the RTO is bypassed, the 95% overall removal efficiency shall not be used to determine total HAP emissions. The total HAP emission rate (ER3) shall be based on usage during that time period, the total HAP content in the inks and a 20% retention factor. The emission rate calculated for this time period shall be added to the monthly emission rate.

$$\text{ER3} = \text{heat-set ink (new and recycled) usage rate (lbs)} * \% \\ \text{total HAP Content}/100 * 0.8$$

SOLVENTS (fountain solution, blanket wash, cleaning solvents, etc.), COATINGS, SEALANTS AND



ADHESIVES:

Emission rate (ER4) shall be calculated assuming 100% loss of total HAPs contained in these products to the ambient air.

$ER4 = \text{solvent/coatings/adhesives (new and recycled) usage rate (lbs/mo)} * \% \text{ total HAP Content}/100$

OTHER SOURCES OF TOTAL HAPS (I.E., PREPRESS, EXEMPT&TRIVIAL ACTIVITIES):

$ER5 = \text{usage rate (lbs/mo)} * \% \text{ Total HAP Content of Product}/100$

The Facility shall keep and maintain records for each process and other HAP contributing activities to determine actual total HAP emissions based on verifiable data. These records shall include the following information:

- 1) A current list of all HAP containing products used throughout the facility, including but not limited to, inks, coatings, solvents, sealants and adhesives. This list shall include information on the manufacturer, brand, product name or code; HAP content in pounds per gallon or percent by weight and density (lb/gallon)/specific gravity; and/or manufacturer's product specifications, material content reports, or laboratory analyses providing this information;
- 2) A monthly log of the consumption of each solvent (including solvents used in cleanup and surface preparation and any recycled solvents), ink (including recycled waste ink), coating, sealant, adhesive, etc. used;
- 3) All purchase orders, invoices, repair/maintenance records, usage and production records, control equipment malfunction/repair/maintenance records and other documents to support information in the monthly log; and
- 4) All calculations used to determine the monthly emissions, including periods of control equipment malfunction, bypass and repair.

To reduce unnecessary HAP emissions to the environment, Buffalo Newspress shall comply with the following handling, storage and disposal requirements for HAP containing compounds: (1) do not use open containers to store or dispose of cloth or paper impregnated with solvents that are used for surface preparation, cleanup or ink/coating removal: (2) do not store spent or fresh



solvents to be used for surface preparation, cleanup or ink/coating removal in open containers; (3) do not use open containers to store or dispense inks and/or surface coatings or solvents unless production, sampling, maintenance or inspection procedures require operational access. This does not apply to the actual device or equipment designed for the purpose of applying an ink or a coating to a substrate; and (4) do not use open containers to store or dispose of inks and or surface coatings.

An exceedance of this emission limit, failure to fulfill the recordkeeping and reporting requirements and/or failure to maintain the good work/housekeeping practices specified in this condition constitutes a violation of 6NYCRR201-6. Exceedance of this limit must be reported to the Department immediately via telephone during normal working hours, but no later than 2 business days after the occurrence. A written report shall be submitted to the Department within 30 days of the occurrence and shall include the cause of the exceedance, corrective action taken, contaminants emitted and an estimate of the emissions.

Parameter Monitored: INKS, SOLVENTS AND ADHESIVES

Upper Permit Limit: 24 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12-month total, rolled monthly

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 2-6: Air pollution prohibited
Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 211.1

Item 2-6.1:

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.

Condition 2-7: Once in, always in
Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 234.1 (c)



Item 2-7.1:

A printing process that is subject to the provisions of Part 234 will remain subject to these provisions even if the emission of VOC from the facility or printing press later falls below the applicability criteria.

Condition 2-8: Compliance Demonstration
Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 234.3 (b) (1) (ii)

Item 2-8.1:

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

Emission Unit: A-00001 Process: 002	Emission Point: 00001 Emission Source: 00001
Emission Unit: A-00001 Process: 002	Emission Point: 00001 Emission Source: 00002
Emission Unit: A-00001 Process: 002	Emission Point: 00001 Emission Source: 00007
Emission Unit: A-00001 Process: 002	Emission Point: 00007 Emission Source: 00009
Emission Unit: A-00001 Process: 002	Emission Point: 00007 Emission Source: 00010
Emission Unit: A-00001 Process: 002	Emission Point: 00008 Emission Source: 00011
Emission Unit: A-00001 Process: 002	Emission Point: 00008 Emission Source: 00012
Regulated Contaminant(s): CAS No: 0NY998-00-0	VOC

Item 2-8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A heat-set web offset lithographic printing process that uses ink, coating or adhesive containing VOC shall not operate if it is located in a severe ozone non-attainment area; has an annual potential to emit (PTE) VOC of 25 tons per year (tpy) or more; or is located at a facility that has an annual potential to emit VOC of 50 tons per year or



more, unless the control equipment provides for an overall removal efficiency of 95 percent or greater for control equipment that was first installed on or after the effective date of this regulation (07/08/2010).

All of the heat-set presses (ES 00001, ES 00002, ES 00010 and ES 00012) at Buffalo Newspress have an annual PTE VOC greater than 25 tpy. Buffalo Newspress has chosen to accept the 95% overall removal efficiency requirement for all regenerative thermal oxidizers (ESC 00007, ESC 00009 and ESC 00011) associated with heat-set web offset lithographic printing presses, including those installed prior to the effective date of this regulation* (ES 00001, ES 00002, and ES 00010). This allows the use of 95% overall removal efficiency to determine the VOC emission rate for heat-set printing operations when emissions pass through the RTO at the required minimum operating temperature of 1500 F, without any bypass. Continuous monitoring and recording of the RTO's combustion chamber temperature verifies that 1500 degrees Fahrenheit is maintained. VOC emissions are tracked to verify compliance with a 49 tpy facility-wide limit on VOCs set to avoid the requirements of 6NYCRR201-6: Title V Facility Permits and 6NYCRR231: New Source Review for New and Modified Facilities.

*Heat-set presses first installed prior to the effective date of this regulation are required have control equipment with an overall removal efficiency of 90 percent or greater.

Parameter Monitored: VOC

Lower Permit Limit: 95 percent reduction by weight

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-9: Compliance Demonstration
Effective between the dates of 06/10/2013 and Permit Expiration Date

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

Item 2-9.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-00001

Process: 001

Emission Source: 00008

Emission Unit: A-00001

Process: 002

Emission Source: 00008



OPERATIONS

Monitoring Description:

Cold-set and heat-set web offset lithographic printing processes that use fountain solutions containing VOC shall not operate if located in a severe ozone non-attainment area or at a facility with total actual annual VOC graphic arts emissions of three tons or more on a 12-month rolling basis, unless the fountain solution as applied contains no more than five percent (5%) alcohol substitute by weight and no alcohol.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FOUNTAIN SOLUTION

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 5 percent alcohol substitute

Reference Test Method: USEPA APPROVED METHODS

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-11: Compliance Demonstration

Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 234.4 (a)

Item 2-11.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-00001 Process: 002	Emission Point: 00001 Emission Source: 00001
Emission Unit: A-00001 Process: 002	Emission Point: 00001 Emission Source: 00002
Emission Unit: A-00001 Process: 002	Emission Point: 00001 Emission Source: 00007
Emission Unit: A-00001 Process: 002	Emission Point: 00007 Emission Source: 00009
Emission Unit: A-00001 Process: 002	Emission Point: 00007 Emission Source: 00010
Emission Unit: A-00001 Process: 002	Emission Point: 00008 Emission Source: 00011
Emission Unit: A-00001 Process: 002	Emission Point: 00008 Emission Source: 00012



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

Item 2-11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Printing processes that use control equipment to comply with the provisions of this Part must test and monitor the control equipment to ensure the overall removal efficiency. Test methods included in this section must be used to demonstrate the overall removal efficiency. For control equipment other than VOC/solvent recovery, the chosen demonstration method must include provisions to determine the overall removal efficiency.

Buffalo Newspress shall conduct performance tests to demonstrate the overall removal efficiency within one year of the issuance of this permit for all Emission Sources (ES 00001, 00002, 00010 and 00012) and Emission Source Controls (ESC 00007, 00009 and 00011) associated with the heat-set web offset lithographic printing process (Process 002). The overall removal efficiency is the total reduction in VOC emissions considering the efficiency of both the capture system and subsequent destruction or removal of these emissions by the control equipment prior to their release into the atmosphere. The performance test shall be conducted to determine the overall removal efficiency for the worst-case scenario, i.e presses operating at maximum capacity, inks with highest VOC content used, the combustion chamber temperature of the RTO at the minimum required temperature of 1500 degrees Fahrenheit, etc. Buffalo Newspress shall use USEPA approved sampling, testing and analytical methods to determine the overall removal efficiency in accordance with 6NYCRR234.4(b).

A stack test protocol shall be submitted to the Department for review and approval within 5 months of the issuance of this permit. A stack test report shall be submitted to the Department for review and approval within 60 days of conducting the performance tests. Buffalo Newspress may be required to conduct additional tests at the Department's discretion.

All records shall be maintained onsite for a minimum of five years and be available for review upon request by the Department and/or Administrator.

Lower Permit Limit: 95 percent reduction by weight



Reference Test Method: USEPA Approved Methods
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-12: Compliance Demonstration
Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 234.4 (c)

Item 2-12.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 2-12.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Continuous control equipment monitors for the following parameters must be installed, periodically calibrated, and operated at all times that the associated control equipment is operated:

- (1) combustion zone temperature of all oxidizers;
 - (2) inlet temperature at the catalytic oxidizer bed;
 - (3) break-through of VOC on a carbon adsorption unit;
- and
- (4) any other continuous monitoring or recording device required by the department.

Buffalo Newspress operates three 4 unit web offset lithographic presses, and one 8 unit web offset lithographic press which utilize heat-set inks (Emission Sources 00001, 00002, 00012 and 00010, respectively). The printed substrates are cured in negative pressure, gas-fired, hot air drying ovens, which are considered part of the printing process. Volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) evaporated in the dryer associated with ES 00001 and ES 00002 are exhausted to a regenerative thermal oxidizer (RTO), identified as Emission Source Control (ESC) 00007. Volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) evaporated in the dryer associated with ES 00010 are exhausted to another RTO, identified as ESC 00009. Volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) evaporated in the dryer associated



with ES 00012 are exhausted to an RTO, identified as ESC 00011. The minimum required operating temperature for the combustion chamber of each RTO is 1500 degrees Fahrenheit.

In accordance with 6NYCRR234.4(c), continuous control equipment monitors for the combustion zone temperature of all oxidizers must be installed, periodically calibrated, and operated at all times that the associated control equipment is operated. The combustion chamber temperature must be continuously monitored and recorded to verify compliance with the minimum temperature requirement. Strip charts and/or electronic data showing continuous monitoring and recording of the combustion chamber operating temperature shall be maintained on-site to verify compliance with the temperature requirement. All electronic data must be stored securely and backed up on a daily basis.

Any noncompliance shall be addressed immediately and reported to the NYSDEC Region 9 office by telephone during normal business hours (or by e-mail) within 2 business days of the occurrence. Appropriate details regarding any noncompliance with the minimum temperature requirement for the combustion chamber shall be recorded including, but not limited to, the cause, the length of the violation, corrective action taken, opacity readings, contaminants emitted, and any increases in emissions with corresponding calculations using the equation specified in this permit under 6NYCRR201-7.1 for the RTO operating at less than 1500 degrees Fahrenheit. This information shall be submitted to the NYSDEC Region 9 office as a written report within 30 days of the occurrence and shall be reported in the annual certification.

The RTOs shall be operated and maintained in accordance with the manufacturer's operation and maintenance manuals which shall be considered part of this permit. Maintenance records shall be kept on-site to verify maintenance performed.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1500 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-13: Compliance Demonstration

Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 234.6

Item 2-13.1:



Any other information required to determine compliance with this Part must be provided to the Department in an acceptable format. Records must be maintained at the facility for five years.

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-15: Compliance Demonstration
Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 234.8

Item 2-15.1:

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

Emission Unit: A-00001	Emission Point: 00001
Emission Unit: A-00001	Emission Point: 00002
Emission Unit: A-00001	Emission Point: 00003
Emission Unit: A-00001	Emission Point: 00004
Emission Unit: A-00001	Emission Point: 00005
Emission Unit: A-00001	Emission Point: 00007
Emission Unit: A-00001	Emission Point: 00008

Regulated Contaminant(s):



CAS No: 0NY998-00-0 VOC

Item 2-15.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A person shall not cause or allow emissions having an average opacity of 10 percent or greater for any consecutive six minute period from any emission source subject to this Part into the outdoor atmosphere. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Compliance with this requirement shall be determined by the facility owner/operator during each shift by conducting a survey of visible emissions from the emission points specified in this condition when printing processes are in operation for a minimum of 2 observations per day during daylight hours. Unless a certified visible emissions evaluator is onsite to verify that the opacity of facility emissions are less than 10%, if visible emissions (> 0 %) are identified at any time, the permittee shall determine the cause, make the necessary correction, and verify that the visible emissions problem has been corrected. If visible emissions continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

The results of the observations must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack: date and time of day; observer's name; identity of emission point; weather condition; was a plume observed? Inclement weather conditions shall be recorded for those days when observations are prohibited. Records of visible emissions observations (and results of any follow-up method 9 analysis), investigations and corrective actions shall be kept on-site in a format acceptable to the Department. The annual certification report must include a summary of any exceedances. This logbook must be retained at the facility for five (5) years after the date of the last entry.



Parameter Monitored: OPACITY
Upper Permit Limit: 10 percent
Reference Test Method: USEPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 1-11: Contaminant List

Effective between the dates of 01/18/2006 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 1-11.1:

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

CAS No: 000078-93-3
Name: METHYL ETHYL KETONE

CAS No: 000098-82-8
Name: BENZENE, (1-METHYLETHYL)

CAS No: 000100-41-4
Name: ETHYLBENZENE

CAS No: 000107-21-1
Name: 1,2-ETHANEDIOL

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 000110-54-3
Name: HEXANE

CAS No: 000111-76-2
Name: ETHANOL, 2-BUTOXY-

CAS No: 000123-31-9
Name: 1,4-BENZENEDIOL

CAS No: 001330-20-7
Name: XYLENE, M, O & P MIXT.

CAS No: 0NY100-00-0
Name: HAP

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

Condition 2-16: Malfunctions and start-up/shutdown activities

Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 2-16.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the



emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, 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 department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 25: Emission Unit Definition
Effective between the dates of 11/03/2000 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 25.1(From Mod 2):

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

Emission Unit: A-00001

Emission Unit Description:

This emission unit consists of 6 four color web offset lithographic printing presses which are utilized to print weekly newspapers, advertising supplements and various publications. The press models are as follows: Emission Source (ES) 00001: (1) Harris N936-4 (4 units); ES 00002: (1) Harris N946-4 (4 units); ES 00005: (1) Harris V-15D-12 (12 units), ES 00006: (1) Harris V-15A-8 (8 units), ES 00010: (1) Heidelberg V30 (8 unit) and ES 00012: Harris N946II (4 unit). All of the presses are



capable of printing cold-set inks (Process 001). Emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) from Process 001 are fugitive and are exhausted through four roof vents (emission points 00002, 00003, 00004, and 00005). In addition, the Harris N936, Harris N946, Heidelberg V30 and Harris N946II presses are capable of printing heat-set inks (Process 002). When heat-set inks are utilized, the ink is cured in negative pressure, gas fired, hot air drying ovens which exhaust to regenerative thermal oxidizers (RTOs) (ES Control 00007 (MEGTEC Millennium RTO) for ES 00001 and ES 00002, ES Control 00009 (Airex/Adwest RTO) for ES 00010 and ES Control 00011 (TANN RTO) for ES 00012). Other sources of VOCs and HAPs are the fountain solution and developer, solvent based cleaners, adhesives and coatings used during the printing processes and for other activities throughout the facility. Both Process 001 and Process 002 include ES 00008, the manual cleaning of the presses with a solvent mixture containing VOCs and HAPs (blanket wash).

Building(s): 01

Condition 2-17: Renewal deadlines for state facility permits
Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 2-17.1:

The owner or operator of a facility having an issued state facility 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.

Condition 2-18: Compliance Demonstration
Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 2-18.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2-18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources

New York State Department of Environmental Conservation

Permit ID: 9-1402-00795/00003

Facility DEC ID: 9140200795



NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 12-month total, rolled monthly
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2014.
Subsequent reports are due every 12 calendar month(s).

Condition 2-19: Visible Emissions Limited
Effective between the dates of 06/10/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 2-19.1:

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

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

Condition 28: Emission Point Definition By Emission Unit
Effective between the dates of 11/03/2000 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 28.1(From Mod 2):

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

- Emission Unit: A-00001
- Emission Point: 00001
 - Height (ft.): 32 Diameter (in.): 24
 - NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01
- Emission Point: 00002
 - Height (ft.): 28 Diameter (in.): 52
 - NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01
- Emission Point: 00003
 - Height (ft.): 28 Diameter (in.): 52
 - NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01
- Emission Point: 00004
 - Height (ft.): 28 Diameter (in.): 52



NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01

Emission Point: 00005
Height (ft.): 28 Diameter (in.): 52
NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01

Emission Point: 00007
Height (ft.): 37 Diameter (in.): 26
NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01

Emission Point: 00008
Height (ft.): 34 Diameter (in.): 22
NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01

Condition 29: Process Definition By Emission Unit
Effective between the dates of 11/03/2000 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 29.1(From Mod 2):

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

Emission Unit: A-00001
Process: 001 Source Classification Code: 4-05-004-33
Process Description:

This Process consists of all six web offset lithographic printing operations in which cold-set inks are applied to paper/film substrates (Emission Sources 00001, 00002, 00005, 00006, 00010, and 00012). The cold-set inks have very low volatility. The inks dry via absorption or oxidation instead of evaporation, which results in 95% of the VOCs being retained by the substrate. Presses are cleaned manually with a solvent mixture (blanket wash), which is identified as Emission Source 00008. All emissions are fugitive and are exhausted to the atmosphere through four roof vents described as emission points 00002, 00003, 00004, and 00005.

Emission Source/Control: 00001 - Process
Design Capacity: 4 Color Units

Emission Source/Control: 00002 - Process
Design Capacity: 4 Color Units

Emission Source/Control: 00005 - Process
Design Capacity: 12 Color Units

Emission Source/Control: 00006 - Process
Design Capacity: 8 Color Units

Emission Source/Control: 00008 - Process



Emission Source/Control: 00010 - Process
Design Capacity: 8 Color Units

Emission Source/Control: 00012 - Process
Design Capacity: 4 Color Units

Item 29.2(From Mod 2):

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

Emission Unit: A-00001
Process: 002 Source Classification Code: 4-02-900-13
Process Description:

This process consists of four web offset lithographic printing operations (Emission Sources (ES) 00001, 00002, 00010 and 00012) in which heat-set inks are applied to a continuous web film and cured in negative pressure, gas fired, hot air drying ovens operated at 275 deg F +/- 50 deg F. The VOC and HAP emissions from the dryers associated with ES 00001 and ES 00002 are controlled by a regenerative thermal oxidizer (RTO), identified as Emission Source Control (ESC) 00007 and exhausted to the atmosphere through Emission Point (EP) 00001. The VOC and HAP emissions from the dryer associated with ES 00010 are controlled by an RTO, identified as ESC 00009 and exhausted to the atmosphere through EP 00007. The VOC and HAP emissions from the dryer associated with ES 00012 are controlled by an RTO, identified as ESC 00011 and exhausted to the atmosphere through EP 00008. The manual cleaning of the presses with solvent mixture is identified as ES 00008. The fugitive emissions from ES 00008 are exhausted to the atmosphere through EPs 00002, 00003, 00004, and 00005.

Emission Source/Control: 00007 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00009 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00011 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00001 - Process
Design Capacity: 4 Color Units

Emission Source/Control: 00002 - Process
Design Capacity: 4 Color Units

Emission Source/Control: 00008 - Process

Emission Source/Control: 00010 - Process
Design Capacity: 8 Color Units



Emission Source/Control: 00012 - Process
Design Capacity: 4 Color Units

