

New York State Department of Environmental Conservation
Facility DEC ID: 9143000213



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1430-00213/00110
Mod 0 Effective Date: 02/08/2000 Expiration Date: 02/08/2005
Mod 1 Effective Date: 01/26/2001 Expiration Date: 02/08/2006
Mod 2 Effective Date: 03/10/2004 Expiration Date: 02/08/2005

Permit Issued To: QUEBECOR WORLD BUFFALO INC
2474 GEORGE URBAN BLVD
DEPEW, NY 14043-2019

Contact: KEVIN J CLARKE
QUEBECOR WORLD BUFFALO INC
2475 GEORGE URBAN BLVD
DEPEW, NY 14043
(716) 686-2500

Facility: QUEBECOR WORLD BUFFALO INC
2475 GEORGE URBAN BLVD
DEPEW, NY 14043

Contact: JANET E SCHMIDT
QUEBECOR WORLD BUFFALO INC
2475 GEORGE URBAN BLVD
DEPEW, NY 14043
(716) 686-2500

Description:

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

Permit Administrator: STEVEN J DOLESKI
DIVISION OF ENVIRONMENTAL PERMITS
270 MICHIGAN AVE
BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

nification 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

ny citizen suit or civil rights

provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

ities, and such persons shall

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

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

as that are authorized by this

The permittee is responsible for obtaining any other permits, approvals, lands, easements and permit.

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

property held or vested in a

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

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

Inspections by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 9

HEADQUARTERS



DEC GENERAL CONDITIONS

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

ains state-only enforceable

terms and conditions

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or al 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.

and Revocations by the Department

Applicable State Requirement: 6NYCRR 621.14

New York State Department of Environmental Conservation
Facility DEC ID: 9143000213



Item 4.1:

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
- able law or regulation have materially changed since the permit was issued.

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: QUEBECOR WORLD BUFFALO INC
2474 GEORGE URBAN BLVD
DEPEW, NY 14043-2019

Facility: QUEBECOR WORLD BUFFALO INC
2475 GEORGE URBAN BLVD
DEPEW, NY 14043

Authorized Activity By Standard Industrial Classification Code:
None Listed On Application

Mod 0 Permit Effective Date: 02/08/2000

Permit Expiration Date: 02/08/2005



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.1: Definitions Applicable To This Permit
- 2 6NYCRR 200.3: False statement
- 3 6NYCRR 200.5: Sealing
- 4 6NYCRR 200.6: Acceptable ambient air quality
- 5 6NYCRR 200.7: Maintenance of equipment
- 6 6NYCRR 201-1.2: Unpermitted Emission Sources
- 7 6NYCRR 201-1.4: Unavoidable Noncompliance and Violations
- 8 6NYCRR 201-1.5: Emergency Defense
- 9 6NYCRR 201-1.7: Recycling and Salvage
- 10 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the Air
- 11 6NYCRR 201-1.10(b): Public Access to Recordkeeping for Title V facilities
- 12 6NYCRR 201-3.2(a): Proof of Eligibility
- 13 6NYCRR 201-3.2(a): Compliance Certification
- 14 6NYCRR 201-3.3(a): Proof of Eligibility
- 15 6NYCRR 201-6: Applicable Criteria, Limits, Terms, Conditions and Standards
- 16 6NYCRR 201-6: Cessation or Reduction of Permitted Activity Not a Defense
- 1-1 6NYCRR 201-6: Compliance Requirements
- 18 6NYCRR 201-6: Federally-Enforceable Requirements
- 19 6NYCRR 201-6: Fees
- 1-2 6NYCRR 201-6: Monitoring, Related Recordkeeping and Reporting Requirements
- 21 6NYCRR 201-6: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements
- 22 6NYCRR 201-6: Permit Shield
- 23 6NYCRR 201-6: Property Rights
- 24 6NYCRR 201-6: Reopening for Cause
- 25 6NYCRR 201-6: Right to Inspect
- 26 6NYCRR 201-6: Severability
- 27 6NYCRR 201-6: Emission Unit Definition
- 1-3 6NYCRR 201-6.5(c)(3): Compliance Certification
- 1-4 6NYCRR 201-6.5(e): Compliance Certification
- 1-5 6NYCRR 201-6.5(g): Permit Exclusion Provisions
- 29 6NYCRR 202-1.1: Required emissions tests
- 30 6NYCRR 202-2.1: Compliance Certification
- 31 6NYCRR 202-2.5: Recordkeeping requirements
- 32 6NYCRR 211.3: Visible emissions limited.
- 1-6 6NYCRR 212.6(a): Compliance Certification
- 34 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 1-7 6NYCRR 225-1.2(a)(2): Compliance Certification
- 35 6NYCRR 225-1.6(b): Compliance.
- 36 6NYCRR 225-1.8(a): Compliance Certification
- 37 6NYCRR 228.1(g): Once in, always in



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

- 1-8 6NYCRR 228.4: Compliance Certification
- 39 6NYCRR 228.10: Handling, storage, and disposal of volatile organic compounds
- 40 6NYCRR 234.1(g): Compliance Certification
- 1-9 6NYCRR 234.3(e): Compliance Certification
- 42 6NYCRR 234.6: Handling, storage, and disposal of volatile organic compounds
- 43 40CFR 60.4, NSPS Subpart A: EPA Region 2 address.
- 44 40CFR 63.6(e)(3), Subpart A: Startup, Shutdown and Malfunction
- 45 40CFR 63.6(e)(3), Subpart A: Compliance Certification
- 46 40CFR 63.820(a), Subpart KK: Applicability of 40CFR 63 Subpart KK
- 47 40CFR 82, Subpart F: Recycling and Emissions Reduction

Emission Unit Level

- 48 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 49 6NYCRR 201-6: Process Definition By Emission Unit

EU=E-G0001

- 50 6NYCRR 212.4(c): Compliance Certification
- 51 6NYCRR 212.4(c): Compliance Certification
- 52 6NYCRR 212.5(c): Emissions from two or more devices through one stack -
Concentration standard
- 53 6NYCRR 212.11(a): Sampling and Monitoring

EU=E-G0002,Proc=02A

- 1-10 6NYCRR 234.3(b)(2): Compliance Certification
- 1-11 6NYCRR 234.4: Compliance Certification

EU=E-G0002,Proc=02B

- 1-12 6NYCRR 234.3(b)(1): Compliance Certification
- 1-13 6NYCRR 234.4: Compliance Certification

EU=E-G0002,Proc=02B,ES=EQ200

- 58 6NYCRR 234.4(c)(2): Compliance Certification

EU=E-G0003

- 1-14 6NYCRR 227-2.4(d): Compliance Certification

EU=E-G0003,Proc=03A

- 60 6NYCRR 227-1.3(a): Compliance Certification

EU=E-G0003,Proc=03C

- 1-15 6NYCRR 225-2.3: Compliance Certification
- 1-16 6NYCRR 225-2.4(b): Compliance Certification
- 1-17 6NYCRR 225-2.5(a): Compliance Certification
- 1-18 6NYCRR 225-2.6: Compliance Certification
- 1-19 6NYCRR 225-2.7: Compliance Certification

EU=E-G0004

- *1-20 6NYCRR 231-2.2(a)(4): Compliance Certification
- 1-21 6NYCRR 234.3(a)(3)(i): Compliance Certification



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

- 63 6NYCRR 234.3(a)(3)(iv): control requirements
- 64 6NYCRR 234.4: Compliance Certification
- 65 6NYCRR 234.4(c)(3): Compliance Certification
- 66 40CFR 60.7(b), NSPS Subpart A: Recordkeeping requirements.
- 67 40CFR 60.7(f), NSPS Subpart A: Facility files for subject sources.
- 68 40CFR 60.11(d), NSPS Subpart A: Compliance with Standards and Maintenance Requirements
- 69 40CFR 60.15, NSPS Subpart A: Reconstruction.
- 70 40CFR 60.432, NSPS Subpart QQ: Compliance Certification
- 71 40CFR 60.433(a), NSPS Subpart QQ: Compliance Certification
- 72 40CFR 60.433(g), NSPS Subpart QQ: Compliance Certification
- 73 40CFR 60.434(a), NSPS Subpart QQ: Compliance Certification
- 74 40CFR 60.434(a), NSPS Subpart QQ: Compliance Certification
- 75 40CFR 60.435(a), NSPS Subpart QQ: Compliance Certification
- 76 40CFR 60.435(b), NSPS Subpart QQ: Compliance Certification
- 77 40CFR 60.435(d)(2), NSPS Subpart QQ: Compliance Certification
- 78 40CFR 60.435(e), NSPS Subpart QQ: Compliance Certification
- 79 40CFR 63.821(a)(1), Subpart KK: Designation of affected sources
- 80 40CFR 63.823, Subpart KK: Part 63 General Provisions requirements
- 81 40CFR 63.824(b)(1)(i), Subpart KK: Compliance Certification
- 82 40CFR 63.824(b)(1)(i), Subpart KK: Compliance Certification
- 83 40CFR 63.827(a)(3), Subpart KK: Exemption from performance test for solvent recovery devices
- 84 40CFR 63.827(b)(1), Subpart KK: Determination of the organic HAP content of organic materials for publication rotogravure sources
- 85 40CFR 63.827(b)(1), Subpart KK: Compliance Certification
- 86 40CFR 63.827(c)(1), Subpart KK: Compliance Certification
- 87 40CFR 63.827(c)(3), Subpart KK: Compliance Certification
- 88 40CFR 63.829(a), Subpart KK: Subpart A record keeping provisions
- 89 40CFR 63.829(b), Subpart KK: Compliance Certification
- 90 40CFR 63.829(c), Subpart KK: Compliance Certification
- 91 40CFR 63.830(a), Subpart KK: Subpart A reporting requirements
- 92 40CFR 63.830(b)(5), Subpart KK: Compliance Certification

EU=E-G0005

- 93 40CFR 63.342(b)(1), Subpart N: Standards apply during all tank operation
- 95 40CFR 63.342(c)(2)(i), Subpart N: Compliance Certification
- 96 40CFR 63.342(c)(2)(i), Subpart N: Compliance Certification
- 97 40CFR 63.342(c)(2)(ii), Subpart N: Exceedance of small hard chrome electroplating cap
- 98 40CFR 63.342(f)(1), Subpart N: Applicability of work practice standards
- 99 40CFR 63.342(f)(2), Subpart N: Acceptable work practices
- 100 40CFR 63.342(f)(3), Subpart N: Operation and maintenance plan
- 101 40CFR 63.342(f)(3), Subpart N: Compliance Certification
- 102 40CFR 63.343(a)(5), Subpart N: Compliance deadline for small hard chromium electroplating facilities that exceed the small facility threshold in the future
- 105 40CFR 63.344(c), Subpart N: Test methods for initial performance test
- 108 40CFR 63.346(a), Subpart N: Compliance Certification
- 109 40CFR 63.346(b), Subpart N: Compliance Certification



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

- 110 40CFR 63.346(c), Subpart N: Compliance Certification
- 111 40CFR 63.347(a), Subpart N: Reporting Requirements
- 112 40CFR 63.347(g)(1), Subpart N: Compliance Certification
- 113 40CFR 63.347(g)(2), Subpart N: Requests to reduce the frequency of ongoing compliance status reports
- 114 40CFR 63.347(g)(3), Subpart N: Compliance Certification
- 115 40CFR 63.347(g)(4), Subpart N: Reporting for facilities using more than one monitoring device to comply with Subpart N

EU=E-G0005,Proc=05A

- 1-22 6NYCRR 212.4(b): Emissions from new emission sources and/or modifications not specified by Table 2

EU=E-G0005,Proc=05A,ES=CHR03

- 1-24 40CFR 63.342(c)(1)(i), Subpart N: Compliance Certification
- 1-25 40CFR 63.343(a)(2), Subpart N: Compliance Certification
- 1-26 40CFR 63.343(b)(1), Subpart N: Compliance Certification
- 1-27 40CFR 63.343(c)(5), Subpart N: Compliance Certification
- 1-23 40CFR 63.344(d)(1), Subpart N: Compliance Certification
- 1-28 40CFR 63.344(d)(1), Subpart N: Compliance Certification
- 1-29 40CFR 63.345(b), Subpart N: Compliance Certification
- 1-30 40CFR 63.345(b)(1), Subpart N: Compliance Certification
- 1-31 40CFR 63.345(b)(2), Subpart N: Compliance Certification
- 1-32 40CFR 63.345(b)(4), Subpart N: Compliance Certification
- 1-33 40CFR 63.345(b)(5)(i), Subpart N: Compliance Certification
- 1-34 40CFR 63.347(c)(2), Subpart N: Compliance Certification

EU=E-G0005,Proc=05A,ES=NECHR

- 1-35 40CFR 63.342(c)(1)(ii), Subpart N: Compliance Certification
- 1-36 40CFR 63.343(b)(1), Subpart N: Compliance Certification
- 1-37 40CFR 63.343(c)(5), Subpart N: Compliance Certification
- 1-38 40CFR 63.344(d)(1), Subpart N: Compliance Certification
- 1-39 40CFR 63.344(d)(1), Subpart N: Compliance Certification

EU=E-G0005,Proc=05A,ES=RDCHR

- 1-40 40CFR 63.342(c)(1)(ii), Subpart N: Compliance Certification
- 1-41 40CFR 63.343(b)(1), Subpart N: Compliance Certification
- 1-42 40CFR 63.343(c)(5), Subpart N: Compliance Certification
- 1-43 40CFR 63.344(d)(1), Subpart N: Compliance Certification

EU=E-G0006,Proc=06A

- 116 6NYCRR 212.10(c)(1): Compliance Certification

EU=E-G0006,Proc=06B

- 117 6NYCRR 228.5: Compliance Certification
- 118 6NYCRR 228.7: Compliance Certification

EU=E-G0008,Proc=08A



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

- 119 6NYCRR 234.3(a)(1): Compliance Certification
- 120 6NYCRR 234.4: Compliance Certification
- 121 40CFR 63.821(b), Subpart KK: Sources excluded from the emission control requirements
- 122 40CFR 63.829(e), Subpart KK: Compliance Certification

EU=E-G0009

- 123 6NYCRR 228.5: Compliance Certification
- 124 6NYCRR 228.7: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 125 6NYCRR 201-5: General Provisions
- 126 6NYCRR 201-5.3(b): Contaminant List
- 127 6NYCRR 211.2: Air pollution prohibited
- 130 6NYCRR 225-1.2(a)(2): Compliance Demonstration

Emission Unit Level

EU=E-G0001,Proc=01A

- 131 6NYCRR 211.2: Compliance Demonstration

EU=E-G0005,Proc=05A

- 133 6NYCRR 212.4(b): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.

Mod 1 Permit Effective Date: 01/26/2001

Permit Expiration Date: 02/08/2006

Mod 2 Permit Effective Date: 03/10/2004

Permit Expiration Date: 02/08/2005



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: 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

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



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 occurred. This notice must contain a description of the

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



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

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item I: 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

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



requirements, regulations, or law.

- Item J: 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 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 K: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item L: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item M: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission**

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Requirements - 6 NYCRR Part 201-6.5(a)(3)

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

Item O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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

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

Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

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

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

iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

Item U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the following:

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

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

Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)

No permit revision will be required for operating changes that contravene an express permit term, provided that such

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

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

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

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

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Act;

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

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

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

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

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

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

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

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

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

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



a shorter time period in the case of an emergency.

Item Y: 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 Z: 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 AA: 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 BB: 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 CC: Federally Enforceable Requirements - 40 CFR 70.6(b)

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



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 subject to annual compliance certification requirements for Title V permits only.

Condition 1: Definitions Applicable To This Permit
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 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 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 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 3: Sealing
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 200.5



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Item 3.1:

(a) 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 labelling 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.

(b) 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.

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 4: Acceptable ambient air quality
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 200.6

Item 4.1:

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

Condition 5: Maintenance of equipment
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 200.7

Item 5.1:

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

Condition 6: Unpermitted Emission Sources
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 6.1:

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:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



(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.

Condition 7: Unavoidable Noncompliance and Violations
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-1.4

Item 7.1:

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 or certificate issued for the corresponding air contamination source. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

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

(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

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

Condition 8: Emergency Defense
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 8.1:

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.

Condition 9: Recycling and Salvage
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 9.1:

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

Condition 10: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-1.8



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Item 10.1:

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

Condition 11: Public Access to Recordkeeping for Title V facilities
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-1.10(b)

Item 11.1:

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Condition 12: Proof of Eligibility
Effective between the dates of 02/08/2000 and 02/08/2005

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

Item 12.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 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.

Condition 13: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

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

Item 13.1:

The Compliance Certification activity will be performed for the Facility.

Item 13.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

AS PROOF OF EXEMPT ELIGIBILITY FOR THE EMERGENCY GENERATORS, THE FACILITY MUST MAINTAIN MONTHLY RECORDS WHICH



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

DEMONSTRATE THAT EACH ENGINE IS OPERATED
LESS THAN 500 HOURS PER YEAR, ON A
12-MONTH ROLLING TOTAL BASIS.

Work Practice Type: HOURS PER YEAR OPERATION

Upper Permit Limit: 500.0 hours

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 03/09/2001 for the period 02/08/2000 through 02/07/2001

Condition 14: Proof of Eligibility

Effective between the dates of 02/08/2000 and 02/08/2005

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

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in 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.

Condition 15: Applicable Criteria, Limits, Terms, Conditions and Standards

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-6

Item 15.1:

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

- i. Any reporting requirements and operations under an accidental release plan, response plan, and compliance plan as approved as of the date of the permit issuance, or
- ii. Any support documents submitted as a part of the permit application for this facility as accepted and approved as of the date of permit issuance.

Any noncompliance with the federally-enforceable portions of this permit constitutes a violation of the federal Clean Air Act and will be grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

Item 15.2:

Any document, including reports, required by the federally-enforceable portions of this permit shall



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

contain a certification by the responsible official for this facility as set forth in Section 201-6.3 that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**Condition 16: Cessation or Reduction of Permitted Activity Not a Defense
Effective between the dates of 02/08/2000 and 02/08/2005**

Applicable Federal Requirement: 6NYCRR 201-6

Item 16.1:

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

**Condition 1-1: Compliance Requirements
Effective between the dates of 01/26/2001 and 02/08/2005**

Applicable Federal Requirement: 6NYCRR 201-6

Replaces Condition(s) 17

Item 1-1.1:

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

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

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

Item 1-1.2:

The permittee shall comply with the approved compliance schedule for this permit if such a schedule is a part of this permit. Risk management plans must be submitted to the Administrator if required by Section 112(r) of the Clean Air Act for this facility.

Item 1-1.3:

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Department within 30 days after the end of a reporting period. Such progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Federally-Enforceable Requirements
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-6

Item 18.1:

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.

Condition 19: Fees
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-6

Item 19.1:

The permittee shall pay the required fees associated with this permit.

Condition 1-2: Monitoring, Related Recordkeeping and Reporting Requirements
Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-6

Replaces Condition(s) 20

Item 1-2.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 21: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements
Effective between the dates of 02/08/2000 and 02/08/2005

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Applicable Federal Requirement: 6NYCRR 201-6

Item 21.1:

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not relieve the permittee from the requirement to comply with any condition contained in this permit.

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Condition 22: Permit Shield

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-6

Item 22.1:

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

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

Condition 23: Property Rights

Effective between the dates of 02/08/2000 and 02/08/2005

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1:

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

Condition 24: Reopening for Cause

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-6

Item 24.1:

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Item 24.2:

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

Item 24.3:

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Condition 25: Right to Inspect

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-6

Item 25.1:

Upon presentation of credentials and other documents, as may be required by law, the permittee shall



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 26: Severability

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-6

Item 26.1:

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

Condition 27: Emission Unit Definition

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-6

Item 27.1(From Mod 1):

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

Emission Unit: E-G0001

Emission Unit Description:

As indicated on the process flow diagram presented in the permit application, emission unit E-G0001 consists of eight book bindery trimmers identified as TR401, TR411, TR421, TR431, TR441, TR461, TR471, and TR481. Each trimmer has pickup points ducted to one of three cyclones located on the roof of the main building. The exhaust from the cyclones discharges directly to the atmosphere. The emission points of the cyclones are identified as 00001, 00002, and 00003. In addition to discharging to the cyclones, the exhaust may also vent to one of three baghouses that discharge air back into the main building. The baghouses are identified as DUSBH, BFWBH, and BFEHB. Dust collector fans pick up dust at the book bindery trimmers and discharge the dust to bins which feed the dust into the bales of paper waste. Emission unit E-G0001 also includes three inserter



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

trimmers identified as TR332, TR334, and TR338. The trim waste is ducted to a cyclone, identified as emission point 00003, which exhausts to the atmosphere.

Additionally, this emission unit includes a hogger which has a stand alone cyclone/baler for paper waste fed into a hopper at the hogger. The baghouse associated with this emission unit discharges to the atmosphere and is identified as emission point 00004.

Permit Modification 01 only reflects the addition of two new emission sources, TR334 and TR401 to this emission unit. The only other change is the deletion of emission source TR451. All emission point, control device, emission source, process descriptions, and applicable requirements are still valid as identified in the initial Title V permit.

Building(s): MAIN

Item 27.2(From Mod 1):

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

Emission Unit: E-G0002

Emission Unit Description:

Emission unit E-G0002 consists of six offset lithographic printing presses. Lithography is a planeographic method in which the image and nonimage areas are on the same plane. The image plate is chemically modified into a hydrophobic, ink-receptive, image area and a hydrophillic, water-loving, nonimage area. Image and nonimage areas remain electrostatically distinct because of the presence of a fountain solution. The fountain solution adheres to the nonimage area while the ink adheres to the image area. The term offset refers to the process where the image is offset or transferred from the plate cylinder to an intermediate blanket cylinder before being transferred to the substrate.

Permit Modification 01 reflects the addition of emission source EQ101 and changes to the operation of emission source EQ132. Press EQ132 was installed and originally permitted in the Title V permit under Process 02B as a two-unit, one color, heat set, web fed, offset press where the ink was dried onto the web utilizing a gas fired dryer. In this permit modification, Quebecor converted Press EQ132 to a non-heat set press which is identified in the permit under Process 02A. All other identified emission points, emission sources, emission control



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

devices, process description, and applicable requirements remain as is in the initial Title V permit.

Building(s): MAIN

Item 27.3(From Mod 1):

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

Emission Unit: E-G0003

Emission Unit Description:

Emission unit E-G0003 includes three dual fuel package boilers identified as emission sources EQ063, EQ064, and EQ065. Emission sources EQ063, EQ064, and EQ065 each have a maximum rated heat input capacity of 25 mmBtu/hr. The three boilers are each capable of firing fuel oil (no. 4, 5, or 6), NOCO Product RL-2100 classified as a waste fuel A, and natural gas. Emission sources EQ064 and EQ065 were constructed in the year 1961. Emission source EQ065 was constructed in the year 1979. As such, these boilers are not subject to 40CFR60 Subpart Dc. The boilers are used to provide the gravure printing process with steam for ink drying and room/web humidification. In addition, the steam is utilized for building heat. Condensate water decanted from the solvent recovery system is used in the boilers for steam generation.

Permit Modification 01 reflects the addition of Process 03C which permits the combustion of the NOCO Product RL-2100 which is classified as a Waste Fuel A in accordance with 6NYCRR Part 225-2.

Building(s): BOILER

Item 27.4(From Mod 1):

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

Emission Unit: E-G0004

Emission Unit Description:

Emission unit E-G0004 contains six rotogravure printing presses and three carbon adsorption units. Gravure printing is a type of printing in which the image area is etched or engraved relative to the surface of the image plate or cylinder. The image area consists of small, recessed cells etched into a copper wrap around a plate. The copper layer is protected from wear by a thin electroplated layer of chromium. As the image cylinder rotates in a bath of ink, ink is picked up in the engraved image area and any excess is removed from the non-image area of the plate by a doctor blade. Ink is transferred from the etched wells in the image area directly to the substrate when the substrate is pressed against the image



plate by a rubber covered impression roller. Each printing station is followed by a high-volume air dryer, before the next ink is applied. Gravure inks have to be highly fluid with a low viscosity and fast drying. The ink in the press fountains can contain as much as 75% solvent by weight. Most of the solvents are evaporated in the press dryers and sent to a solvent recovery system for reclaiming.

Quebecor utilizes three solvent recovery systems to capture and recover VOC emissions from each of the publication rotogravure printing processes at the facility. In the operation of the solvent recovery systems, the exhaust air from the rotogravure printing operations are collected and passed through large beds of activated carbon. The carbon beds adsorb all but trace amounts of the solvent vapor. When a bed is saturated, the exhaust stream is diverted to a nonsaturated bed and the saturated bed is regenerated by steaming. The resulting steam-solvent-vapor mixture is condensed. The solvent and the condensed water are separated by gravity in a decanter vessel. The solvents are composed of toluene and mixtures of similar boiling point aliphatic hydrocarbons. The recovered solvents are used within the plant for ink dilution and viscosity control, and some solvent is returned to the ink supplier for reuse. The condensed water is used in the boilers for steam generation.

The existing six rotogravure presses are identified as emission sources EQ210, EQ211, EQ212, EQ214, EQ217, and EQ218. The three carbon adsorption units are identified as CT068, CT071, and CT075. Emission source CT068 is more commonly referred to as the RD solvent recovery system. The RD solvent recovery system is a three carbon bed system primarily used to recover the solvent laden air (SLA) captured from rotogravure press 211. Emission source CT071 is more commonly referred to as the NE solvent recovery system. The NE system is a five carbon bed system used primarily to recover SLA captured from presses 217 and 218. Emission source CT075 is more commonly referred to as the Dayton solvent recovery system. The Dayton system is a four horizontal carbon bed system primarily used to recover the SLA captured from rotogravure presses 210, 212, and 214. Even though certain presses are generally directed to certain recovery systems, Quebecor does have the flexibility and capability to direct the captured SLA to any of the three solvent recovery systems. As such, the three systems each



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

interact together and are viewed as a single total system.

Building(s): MAIN

Item 27.5(From Mod 1):

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

Emission Unit: E-G0005

Emission Unit Description:

Emission unit E-G0005 consists of three hard chromium electroplating tanks with a maximum cumulative potential rectifier capacity of greater than 60 million amp-hr per year. Pursuant to 40CFR63.342(c)(2)(i), Quebecor has limited the rectifier capacity to below 60 million amp-hr/yr.

Permit Modification 01 reflects the addition of emission source CHR03 and the associated control equipment. All other information relative this emission unit remains as in the initial Title V permit.

Building(s): MAIN

Item 27.6(From Mod 1):

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

Emission Unit: E-G0006

Emission Unit Description:

Emission unit E-G0006 consists of 7 book binders with hot melt glue pots for attaching the covers to paperback books. Binders EQ430, EQ440, and EQ460 have open glue pots with stack emissions. Binders EQ400, EQ420, EQ410, EQ411, EQ470, EQ480, and EQ481 have closed glue pots with no stack emissions.

Four of the trimmers, identified as EQ431, EQ441, EQ461, and EQ471, have stain booths for applying yellow stain to the edges of a stack of books.

Permit Modification 01 reflects the deletion of emission sources EQ450 and EQ451 and the installation of sources EQ400 and EQ401. All other information contained within the Title V permit remains in affect.

Building(s): MAIN

Item 27.7(From Mod 0):

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

Emission Unit: E-G0007

Emission Unit Description:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Emission unit E-G0007 consists of three horizontal carbon steel solvent tanks, each with a capacity of 10,000 gallons. The material contained in the tanks is recovered solvent from the solvent recovery system. Additionally, there is one 10,000 gallon capacity storage tank which is temporarily out of service. The tanks are located indoors in a secondary containment vault. The tanks do not directly vent outdoors, but do have emergency relief vents associated with them. The four - 10,000 gallon capacity carbon steel solvent storage tanks, are not subject to the requirements of 6NYCRR Part 229.3(g) and 6NYCRR Part 229.3(e)(2)(iv) since the tanks are horizontal volatile organic liquid storage tanks, as specified in 6NYCRR Part 229.3(f)(4). In addition, the tanks are not subject to 40CFR60 Subpart Kb, since the capacity is less than 40 cubic meters. As such, this emission unit has no associated conditions in the permit.

Building(s): MAIN

Item 27.8(From Mod 1):

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

Emission Unit: E-G0008

Emission Unit Description:

Emission unit E-G0008 includes ten flexographic printing presses. Flexography is rotary web letterpress printing. It is the application of words or pictures to a substrate by means of a relief technique in which the image area is raised above the non-image area. Image plates are mounted to cylinders with adhesives. Ink is applied to these image carriers which are made of rubber or other elastomeric material. The ink image is then transferred from the flexible plate to the substrate. These presses use a cold-set, isoparaphinic (wax) solvent based ink and are capable of printing one color on a newsprint web.

Permit Modification reflects the addition of two new emission sources identified as EQ118 and EQ119. All other information remains as is in the initial Title V permit.

Building(s): MAIN

Item 27.9(From Mod 1):

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

Emission Unit: E-G0009

Emission Unit Description:

Emission unit E-G0009 contains nine ink jet printing operations which print identifying information onto



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

cardboard boxes. There are no associated emission points with these sources.

Building(s): MAIN

Condition 1-3: Compliance Certification
Effective between the dates of 01/26/2001 and 02/08/2005

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

Item 1-3.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-3.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2001.
Subsequent reports are due every 6 calendar month(s).

Condition 1-4: Compliance Certification
Effective between the dates of 01/26/2001 and 02/08/2005

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

Replaces Condition(s) 28

Item 1-4.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-4.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Compliance certifications shall contain the following information:

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

and

- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

Compliance certifications shall be submitted annually.
Certification reports are due 30 days after the end of the calendar year.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



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

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring
and Enforcement
50 Wolf Road
Albany, NY 12233-3258

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2002.
Subsequent reports are due on the same day each year

Condition 1-5: Permit Exclusion Provisions
Effective between the dates of 01/26/2001 and 02/08/2005

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

Item 1-5.1:

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 currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant 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), and particularly any such enforcement



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

action as may be authorized pursuant to 6 NYCRR 201-1.2 and 6 NYCRR 201-6.5(g).

The issuance of this permit by the Department and the receipt thereof by the Applicant does not supercede, revoke or rescind an order or modification thereof on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements contained in such order or modification thereof unless specifically intended by this permit.

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 the right of the Department to bring any future action, or pursue any pending action, either administrative or judicial, to required remediation, contribution for costs incurred or funds expended, for any violations, past, present or future, known or unknown, of applicable federal law, the ECL, or the rules and regulations promulgated thereunder, or conditions contained in any other licenses or permits issued to the Applicant and not addressed in this permit.

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 the right of the Department to pursue any claims for natural resource damages against the Applicant.

Condition 29: Required emissions tests
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 29.1:

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.

Condition 30: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

Condition 31: Recordkeeping requirements

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 31.1:

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

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

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

Condition 32: Visible emissions limited.

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 211.3

Item 32.1:

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

Condition 1-6: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 212.6(a)

Replaces Condition(s) 33

Item 1-6.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-6.2:

Compliance Certification shall include the following monitoring:

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

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Monitoring Description:

No person will 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. Quebecor has agreed to maintain a certified Method 9 opacity observer on staff. As such, the Department requires Quebecor to perform routine opacity observations of the particulate sources. The cyclones and baghouses in emission unit E-G0001 will be observed on a weekly basis. The chromium electroplating tanks in emission unit E-G0005, and the melting of glue in emission unit E-G0006 will be observed on a quarterly basis. The observations should be documented, maintained on-site for a period of 5 years and be made available for review upon request by the Department. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

**Condition 34: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 02/08/2000 and 02/08/2005**

Applicable Federal Requirement: 6NYCRR 215

Item 34.1:

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.

**Condition 1-7: Compliance Certification
Effective between the dates of 01/26/2001 and 02/08/2005**

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Applicable Federal Requirement: 6NYCRR 225-1.2(a)(2)

Item 1-7.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person will sell, offer for sale, purchase or use any residual oil fuel which contains sulfur in a quantity exceeding the following limitation.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RESIDUAL FUEL (#4, #5 AND/OR #6 FUEL OIL)

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 35: Compliance.

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 225-1.6(b)

Item 35.1:

As of January 1, 1988 any person who buys, sells, offer for sale, or uses fuel must comply with the percent sulfur requirements specified in section 6 NYCRR 225-1.2 of this regulation.

Condition 36: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 225-1.8(a)

Item 36.1:

The Compliance Certification activity will be performed for the Facility.

Item 36.2:

Compliance Certification shall include the following monitoring:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee shall retain fuel oil supplier certifications for each shipment of oil received. Such certifications shall contain, as a minimum: supplier name, date of shipment, quantity shipped, heating value of the oil, oil sulfur content, and the method used to determine the sulfur content. Such certifications shall be available for inspection by, or submittal to, NYSDEC upon request.

Monitoring Frequency: PER DELIVERY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 37: Once in, always in
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 228.1(g)

Item 37.1:

Any coating line subject to the provisions of this Part, will remain subject to these provisions even if the facility annual potential to emit VOC later falls below applicability criteria.

Condition 1-8: Compliance Certification
Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 228.4

Replaces Condition(s) 38

Item 1-8.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-8.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any surface coating operation, except only the emission of uncombined water. Quebecor has agreed to maintain a Method 9 certified opacity observer on staff. As such, the Department requires Quebecor to perform routine (i.e., a minimum of quarterly) opacity



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

observations of the surface coating sources which include the staining process in emission unit E-G0006. Opacity observations can not be completed from the ink jet surface coating operation in Emission Unit E-G0009, since there are no associated emission points from which to make the opacity observations. The opacity observations from the staining process should be documented, maintained on-site for a period of 5 years, and be made available for review upon request by the Department. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 39: Handling, storage, and disposal of volatile organic compounds
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 228.10

Item 39.1:

No owner or operator of a facility subject to 6NYCRR Part 228 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 coating removal;
- (b) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup, or coating removal;
- (c) use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere;
- (d) use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance, or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate; or
- (e) use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Condition 40: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 234.1(g)

Item 40.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Any printing process that is subject to the provisions of 6NYCRR Part 234 will remain subject to these provisions even if the emissions of volatile organic compounds from the facility later fall below the applicability criteria.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-9: Compliance Certification
Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 234.3(e)

Replaces Condition(s) 41

Item 1-9.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 1-9.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

agreed to maintain a Method 9 certified opacity observer on staff. As such, the Department requires Quebecor to perform routine (i.e. a minimum of quarterly) opacity observations of the printing operations subject to 6NYCRR Part 234 which includes emission points in emissions units E-G0002 and E-G0004. Opacity observations can not be completed from the printing operations in emission unit E-G0008, since there are no associated emission points from which to make the opacity observations. The opacity observations should be documented, maintained on-site for a period of 5 years and be made available for review upon request by the Department. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 42: Handling, storage, and disposal of volatile organic compounds
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 234.6

Item 42.1:

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



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

(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.

Condition 43: EPA Region 2 address.
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.4, NSPS Subpart A

Item 43.1:

All requests, reports, applications, submittals, and other communications to the Administrator pursuant to this part shall be submitted in duplicate to the following address:

Director, Division of Enforcement and Compliance Assistance
USEPA Region 2
290 Broadway, 21st Floor
New York, NY 10007-1886

Copies of all correspondence to the administrator pursuant to this part shall also be submitted to the NYSDEC Regional Office issuing this permit (see address at the beginning of this permit) and to the following address:

NYSDEC
Bureau of Enforcement and Compliance Assurance
50 Wolf Road
Albany, NY 12233-3254

Condition 44: Startup, Shutdown and Malfunction
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.6(e)(3), Subpart A

Item 44.1:

The owner or operator of an applicable source shall develop and implement a written startup, shutdown and malfunction (SSM) plan that describes in detail procedures for operating and maintaining the source during periods of SSM and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Consult 40 CFR 63.6(e)(3) (i through viii) for specific requirements regarding SSM plans.

Condition 45: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.6(e)(3), Subpart A

Item 45.1:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As required by 40CFR63.6(e)(3), Quebecor has developed and implemented a written startup, shutdown, and malfunction plan for operating and maintaining the source during periods of startup, shutdown, and malfunction. In addition, the plan includes corrective action for a malfunctioning process and air pollution control equipment. This plan was submitted with the permit application and is made part of this permit by reference.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 46: Applicability of 40CFR 63 Subpart KK
Effective between the dates of 02/08/2000 and 02/08/2005**

Applicable Federal Requirement: 40CFR 63.820(a), Subpart KK

Item 46.1:

The provisions of 40CFR63 Subpart KK apply to:

1. Each new and existing facility that is a major source of hazardous air pollutants, as defined in 40CFR63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated, and
2. each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated and for which the owner or operator chooses to commit to, and meets the criteria of paragraphs (a)(2)(i) and (a)(2)(ii) of section 63.820 for purposes of establishing the facility to be an area source with respect to Subpart KK.

**Condition 47: Recycling and Emissions Reduction
Effective between the dates of 02/08/2000 and 02/08/2005**

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 47.1:

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVAC's in Subpart B:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR Part 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR Part 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR Part 82.161.
- d. Persons disposing of small appliances, MVAC's, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR Part 82.166. ("MVAC-like appliance as defined at 40 CFR Part 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR Part 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR Part 82.166.

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

**Condition 48: Emission Point Definition By Emission Unit
Effective between the dates of 02/08/2000 and 02/08/2005**

Applicable Federal Requirement: 6NYCRR 201-6

Item 48.1(From Mod 0):

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

Emission Unit: E-G0001

Emission Point: 00001

Height (ft.): 41	Diameter (in.): 72	
NYTMN (km.): 4758.32	NYTME (km.): 196.429	Building: MAIN

Emission Point: 00002

Height (ft.): 41	Length (in.): 84	Width (in.): 36
NYTMN (km.): 4758.32	NYTME (km.): 196.429	Building: MAIN

Emission Point: 00003

Height (ft.): 68	Length (in.): 84	Width (in.): 36
NYTMN (km.): 4758.32	NYTME (km.): 196.429	Building: MAIN

Emission Point: 00004

Height (ft.): 40	Diameter (in.): 60
------------------	--------------------



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Item 48.2(From Mod 0):

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

Emission Unit: E-G0002

Emission Point: 00036

Height (ft.): 40

Diameter (in.): 10

NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Emission Point: 00078

Height (ft.): 48

Length (in.): 18

Width (in.): 18

NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Item 48.3(From Mod 0):

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

Emission Unit: E-G0003

Emission Point: 00063

Height (ft.): 50

Diameter (in.): 24

NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: BOILER

Emission Point: 00064

Height (ft.): 50

Diameter (in.): 24

NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: BOILER

Emission Point: 00065

Height (ft.): 50

Diameter (in.): 24

NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: BOILER

Item 48.4(From Mod 0):

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

Emission Unit: E-G0004

Emission Point: 0068A

Height (ft.): 24

Diameter (in.): 30

Emission Point: 0068B

Height (ft.): 24

Diameter (in.): 30

Emission Point: 0068C

Height (ft.): 24

Diameter (in.): 30

Emission Point: 0071A

Height (ft.): 24

Diameter (in.): 30

Emission Point: 0071B



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Height (ft.): 24	Diameter (in.): 30
Emission Point: 0071C Height (ft.): 24	Diameter (in.): 30
Emission Point: 0071D Height (ft.): 24	Diameter (in.): 30
Emission Point: 0071E Height (ft.): 24	Diameter (in.): 30
Emission Point: 0075A Height (ft.): 24	Diameter (in.): 30
Emission Point: 0075B Height (ft.): 24	Diameter (in.): 30
Emission Point: 0075C Height (ft.): 24	Diameter (in.): 30

Item 48.5(From Mod 0):

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

Emission Unit: E-G0005			
Emission Point: 00085			
Height (ft.): 36	Diameter (in.): 16		
NYTMN (km.): 4758.32	NYTME (km.): 196.429	Building: MAIN	
Emission Point: 00089			
Height (ft.): 34	Diameter (in.): 13		
NYTMN (km.): 4758.32	NYTME (km.): 196.429	Building: MAIN	
Emission Point: CHR03			
Height (ft.): 33	Diameter (in.): 20		

Item 48.6(From Mod 0):

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

Emission Unit: E-G0006			
Emission Point: 00037			
Height (ft.): 36	Diameter (in.): 15		
NYTMN (km.): 4758.32	NYTME (km.): 196.429	Building: MAIN	
Emission Point: 00038			
Height (ft.): 39	Diameter (in.): 18		
NYTMN (km.): 4758.32	NYTME (km.): 196.429	Building: MAIN	



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Emission Point: 00039
Height (ft.): 39 Diameter (in.): 18
NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Emission Point: 00040
Height (ft.): 39 Diameter (in.): 18
NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Emission Point: 00046
Height (ft.): 39 Diameter (in.): 18
NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Emission Point: 00047
Height (ft.): 39 Diameter (in.): 18
NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Emission Point: 00049
Height (ft.): 39 Diameter (in.): 14
NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Emission Point: 00066
Height (ft.): 39 Diameter (in.): 18
NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Emission Point: 00067
Height (ft.): 39 Diameter (in.): 18
NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Emission Point: 00076
Height (ft.): 39 Diameter (in.): 15
NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Emission Point: 00077
Height (ft.): 39 Diameter (in.): 15
NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Emission Point: 00098
Height (ft.): 39 Diameter (in.): 18
NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Condition 49: Process Definition By Emission Unit
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 201-6

Item 49.1(From Mod 1):

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

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Emission Unit: E-G0001

Process: 01A

Source Classification Code: 3-07-012-01

Process Description:

Emission unit E-G0001, Process 01A is the process where bound books are stacked and cut for squareness. The paper trimmings are collected from five pickup points from each of the eight trimmers and two inserter machines. The paper trimmings are vacuumed into the cyclone/baler and formed into bales for recycling. The particulate emissions are ducted to the atmosphere after passing through cyclones or to baghouses which vent back into the main building.

Emission Source/Control: 00CCY - Control
Control Type: CENTRIFUGAL

Emission Source/Control: 00SCY - Control
Control Type: CENTRIFUGAL

Emission Source/Control: 00WCY - Control
Control Type: CENTRIFUGAL

Emission Source/Control: BFE BH - Control
Control Type: CENTRIFUGAL

Emission Source/Control: BFWBH - Control
Control Type: CENTRIFUGAL

Emission Source/Control: DUSBH - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

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

Emission Source/Control: HOGCY - Control
Control Type: CENTRIFUGAL

Emission Source/Control: NCYBH - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: EQHOG - Process

Emission Source/Control: TR332 - Process

Emission Source/Control: TR334 - Process

Emission Source/Control: TR338 - Process



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Emission Source/Control: TR401 - Process

Emission Source/Control: TR411 - Process

Emission Source/Control: TR421 - Process

Emission Source/Control: TR431 - Process

Emission Source/Control: TR441 - Process

Emission Source/Control: TR451 - Process

Emission Source/Control: TR461 - Process

Emission Source/Control: TR471 - Process

Emission Source/Control: TR481 - Process

Item 49.2(From Mod 1):

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

Emission Unit: E-G0002

Process: 02A

Source Classification Code: 4-05-004-01

Process Description:

Emission unit E-G0002, Process 02A includes six offset lithographic printing presses which print on paper substrates utilizing cold set inks. The nonheat-set or cold-set printing process is distinguished by its unique ink and paper requirements. Nonheat-set inks are semifluid materials whose function depends on the rapid absorption of the liquid component by the surface of the paper. The capillary action of the paper surface draws the liquid into the paper surface and sets the ink. This process does not require the application of heat to cure the resin or evaporate the liquid component. Since most of the materials are retained in the printed sheet, emissions during press operation are minimal.

The six offset lithographic printing presses were installed and operated on or after September 1, 1988 and are required to utilize a fountain solution containing less than 10 percent VOC by weight. Details of each press are specified below:

- (1) Press EQ033 is a nonheat-set, sheet fed, offset press with an in-line coating unit that uses a water based coating with infrared curing. This press has a

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



ventilation point for removing excess heat.

(2) Press EQ038 is a non-heat set, sheet fed, offset press. This press has no direct emission points to the outside atmosphere.

(3) Press EQ100 is a non-heat set, sheet fed, offset press which uses a UV lamp for curing. This press has no direct emission points to the outside atmosphere.

(4) Press EQ101 is a non-heat set, sheet fed, offset press. This press has no direct emission points to the outside atmosphere.

(5) Press EQ125 is a two-unit, one color, non-heat set, web offset press. This press has no direct emission points to the outside atmosphere.

(6) Press EQ132 was installed and originally permitted in the Title V permit under Process 02B as a two-unit, one color, heat set, web fed, offset press where the ink was dried onto the web utilizing a gas fired dryer. The press was installed and operated before September 1, 1988, and thus, was required to utilize a fountain solution containing less than 15 percent VOC by weight. In this permit modification, Quebecor converted Press EQ132 to non-heat set press which is identified in the permit under Process 02A. Since, the change in the operation of the press occurred after September 1, 1988, Quebecor is now required to utilize a fountain solution containing less than 10 percent VOC by weight. This press has no direct emission points to the outside atmosphere.

Emission Source/Control: EQ033 - Process

Emission Source/Control: EQ038 - Process

Emission Source/Control: EQ100 - Process

Emission Source/Control: EQ101 - Process

Emission Source/Control: EQ125 - Process

Emission Source/Control: EQ132 - Process

Item 49.3(From Mod 1):

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

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Emission Unit: E-G0002

Process: 02B

Source Classification Code: 4-05-004-11

Process Description:

Emission unit E-G0002, Process 02B includes one offset lithographic printing presses which prints on paper substrates utilizing heat set inks. Heatset offset lithography is similar to the cold set process due to the type of plates used and the requirement for fountain solution to maintain a printing image. However, the difference is the inks require energy to dry; thus, dryers are used to cause the ink oil to evaporate, and web cooling devices or chill rollers are used to allow for an increased web speed.

The offset, heatset press was installed and operated before September 1, 1988 and is required to utilize a fountain solution containing less than 15 percent VOC by weight. Press EQ200 is a heat set, web fed, offset press.

This press has five double printing units for printing one color on each side of the web. The ink is dried onto the web as it passes through a gas fired dryer. Although press EQ200 controls VOC emissions by limiting the amount of VOC in the fountain solution, additional control of VOC emissions is maintained through the operation and maintenance of a catalytic afterburner.

Emission Source/Control: CT078 - Control

Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: EQ200 - Process

Item 49.4(From Mod 1):

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

Emission Unit: E-G0003

Process: 03A

Source Classification Code: 1-02-004-02

Process Description:

Emission unit E-G0003, Process 03A, consists of three boilers which combust No. 4, 5, or 6 fuel oil to produce steam.

Emission Source/Control: EQ063 - Combustion

Emission Source/Control: EQ064 - Combustion

Emission Source/Control: EQ065 - Combustion



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Item 49.5(From Mod 1):

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

Emission Unit: E-G0003

Process: 03B

Source Classification Code: 1-03-006-02

Process Description:

Emission unit E-G0003, Process 03B, consists of three boilers which combust natural gas to produce steam.

Emission Source/Control: EQ063 - Combustion

Emission Source/Control: EQ064 - Combustion

Emission Source/Control: EQ065 - Combustion

Item 49.6(From Mod 1):

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

Emission Unit: E-G0003

Process: 03C

Source Classification Code: 1-02-013-02

Process Description:

Emission unit E-G0003, Process 03C, consists of three boilers which combust the NOCO Product RL-2100 Waste Fuel A to produce steam.

Emission Source/Control: EQ063 - Combustion

Emission Source/Control: EQ064 - Combustion

Emission Source/Control: EQ065 - Combustion

Item 49.7(From Mod 1):

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

Emission Unit: E-G0004

Process: 04A

Source Classification Code: 4-05-005-11

Process Description:

Emission unit E-G0004, Process 04A, consists of printing on a paper substrate via six rotogravure presses. One of the existing presses, identified as EQ214, was constructed after October 28, 1980 and, thus, is subject to 40CFR60 Subpart QQ. The remaining five presses were each constructed prior to October 28, 1980 and, thus, are not subject to 40CFR60 Subpart QQ. Instead, the remaining five presses are applicable to a less stringent regulation, 6NYCRR Part 234. However, due to the interconnection during the operation of the six presses and the three solvent recovery systems, Quebecor has



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

elected to continue to maintain the higher standard for all six presses and make all the rotogravure presses comply with 40CFR60 Subpart QQ.

Emission Source/Control: CT068 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CT071 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CT075 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: EQ210 - Process

Emission Source/Control: EQ211 - Process

Emission Source/Control: EQ212 - Process

Emission Source/Control: EQ214 - Process

Emission Source/Control: EQ215 - Process Removal Date: 12/01/1999

Emission Source/Control: EQ216 - Process Removal Date: 12/01/1999

Emission Source/Control: EQ217 - Process

Emission Source/Control: EQ218 - Process

Item 49.8(From Mod 1):

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

Emission Unit: E-G0005

Process: 05A

Source Classification Code: 3-09-010-06

Process Description:

Emission unit E-G0005, Process 05A, is a hard chromium electroplating process where engraved copper plates are plated with 3 microns of chromium. The chromium plated, copper plates are used on the gravure cylinders for production printing. The chrome plating bath utilizes a fume suppressant to reduce misting. In addition, a plate and baffle mist eliminator is used in the exhaust stream.

Emission Source/Control: CT085 - Control

Control Type: MIST ELIMINATOR



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Emission Source/Control: CT89A - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: CT89B - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: CTR03 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: CHR03 - Process

Emission Source/Control: NECHR - Process

Emission Source/Control: RDCHR - Process

Item 49.9(From Mod 1):

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

Emission Unit: E-G0006

Process: 06A

Source Classification Code: 3-07-007-27

Process Description:

Emission unit E-G0006, Process 06A, consists of melting glue beads and application of the melted glue to the book binder.

Emission Source/Control: EQ400 - Process

Emission Source/Control: EQ410 - Process

Emission Source/Control: EQ430 - Process

Emission Source/Control: EQ440 - Process

Emission Source/Control: EQ450 - Process

Emission Source/Control: EQ460 - Process

Emission Source/Control: EQ470 - Process

Emission Source/Control: EQ480 - Process

Item 49.10(From Mod 1):

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

Emission Unit: E-G0006

Process: 06B

Source Classification Code: 4-02-013-01

Process Description:

Emission unit E-G0006, Process 06B, consists of applying



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

stain to book edges using a staining booth.

Emission Source/Control: EQ401 - Process

Emission Source/Control: EQ411 - Process

Emission Source/Control: EQ431 - Process

Emission Source/Control: EQ441 - Process

Emission Source/Control: EQ451 - Process

Emission Source/Control: EQ461 - Process

Emission Source/Control: EQ471 - Process

Emission Source/Control: EQ481 - Process

Item 49.11(From Mod 0):

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

Emission Unit: E-G0007

Process: 07A

Source Classification Code: 4-07-158-12

Process Description:

Emission unit E-G0007, Process 07A, consists of the storage of recovered solvent in three - 10,000 gallon capacity horizontal storage tanks. These storage tanks are identified as TAK6A, TANK7, and TANK8. The source identified as TK14A is a 10,000 gallon storage tank which is temporarily out of service.

Emission Source/Control: TAK6A - Process

Emission Source/Control: TANK7 - Process

Emission Source/Control: TANK8 - Process

Emission Source/Control: TK14A - Process

Item 49.12(From Mod 1):

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

Emission Unit: E-G0008

Process: 08A

Source Classification Code: 4-05-003-01

Process Description:

Emission unit E-G0008, Process 08A, consists of printing on a paper substrate utilizing flexographic presses.



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Emission Source/Control: EQ109 - Process

Emission Source/Control: EQ110 - Process

Emission Source/Control: EQ111 - Process

Emission Source/Control: EQ112 - Process

Emission Source/Control: EQ114 - Process

Emission Source/Control: EQ115 - Process

Emission Source/Control: EQ116 - Process

Emission Source/Control: EQ117 - Process

Emission Source/Control: EQ118 - Process

Emission Source/Control: EQ119 - Process

Item 49.13(From Mod 1):

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

Emission Unit: E-G0009

Process: 09A

Source Classification Code: 4-05-004-31

Process Description:

Emission unit E-G0009, Process 09A, includes ink jet printing of identifying information onto cardboard boxes.

Emission Source/Control: EQIK9 - Process

Condition 50: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

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: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 51: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The associated air pollution control equipment will be operated in accordance with good engineering practice and manufacturer recommendations. A log book will be maintained indicating all maintenance activities completed on the cyclones and baghouses.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 52: Emissions from two or more devices through one stack - Concentration standard
Effective between the dates of 02/08/2000 and 02/08/2005



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Applicable Federal Requirement: 6NYCRR 212.5(c)

Item 52.1:

This Condition applies to Emission Unit: E-G0001

Item 52.2:

Where air contaminants from two or more devices or contrivances are emitted to the outdoor atmosphere through a single emission point and the applicable emission standard for one or more of such devices or contrivances if vented separately to the outdoor atmosphere is a concentration standard (grains per standard cubic foot), the permissible emission rate through such emission point shall not exceed the quantity that would be allowed if said emissions were through separate emission points.

Condition 53: Sampling and Monitoring

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 212.11(a)

Item 53.1:

This Condition applies to Emission Unit: E-G0001

Item 53.2:

The owner and/or operator of this facility, if required by the department to conduct stack testing to demonstrate compliance with 6 NYCRR Part 212, must comply with notification requirements and conduct capture efficiency and/or stack testing using acceptable procedures pursuant to 6 NYCRR Part 202.

Condition 1-10: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

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

Replaces Condition(s) 54

Item 1-10.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0002

Process: 02A

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-10.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The fountain solution must contain 10 percent by weight or less of volatile organic compounds for presses EQ033,



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

EQ038, EQ100, EQ101, EQ125, and EQ132. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

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: CONTINUOUS
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2001.
Subsequent reports are due every 6 calendar month(s).

Condition 1-11: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 234.4

Replaces Condition(s) 55

Item 1-11.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0002
Process: 02A

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

Item 1-11.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Compliance with the maximum allowable 10 percent by weight or less of volatile organic compounds (VOC) content of the fountain solution for presses EQ033, EQ038, EQ100, EQ101, EQ125, and EQ132 will be demonstrated through dilution calculation records and sample test results.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



The fountain solution is purchased in a concentrated form. The manufacturer of the fountain solution recommends a certain dilution to obtain the recommended operating formulation. Quebecor shall prepare the as-applied fountain solution in accordance with the recommended formulation. Alternatively, Quebecor may calculate a formulation using the VOC content of the concentrated fountain solution and a predetermined amount of water to obtain a diluted solution with a VOC content less than the regulated value.

Quebecor generally has specific fountain solution formulations for each press. These formulations typically do not change. As such, Quebecor will complete an initial analytical test of each as-applied, fountain solution to determine the VOC content. The initial analysis will be completed within one year upon issuance of the permit. Following the initial analysis, the fountain solution will be analyzed when the formulation is changed or once every five years upon permit renewal, whichever is sooner.

In order to demonstrate continued compliance with the maximum allowable VOC content of the fountain solution, Quebecor will maintain the following records: (1) Material Safety Data Sheets or other similar certification from the manufacturer of the fountain solution to document the concentrated VOC content, and (2) records of the dilution methods or calculations used to prepare the as-applied fountain solution used in the off-set lithographic presses.

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of the fountain solution are presented in Appendix A, Methods 24, of 40CFR60. Alternate analytical methods must be approved by the commissioner and the USEPA.

The results of any analysis or other procedure used for establishing compliance with this Part must be maintained on-site for a period of 5 years and be made available for review upon request by the Department. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements. Representatives of the Department of Environmental Conservation shall be

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



permitted, during reasonable business hours, to obtain fountain solution samples for the purpose of determining compliance with this Part.

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 (40CFR60)

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 1-12: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

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

Replaces Condition(s) 56

Item 1-12.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0002

Process: 02B

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-12.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The fountain solution must contain 15 percent by weight or less of volatile organic compounds for press EQ200. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: FOUNTAIN SOLUTION
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 15 percent by weight
Reference Test Method: Method 24
Monitoring Frequency: CONTINUOUS
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2001.
Subsequent reports are due every 6 calendar month(s).

Condition 1-13: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 234.4

Replaces Condition(s) 57

Item 1-13.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0002

Process: 02B

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-13.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

Compliance with the maximum allowable 15 percent by weight or less of volatile organic compounds content in the fountain solution for press EQ200 will be demonstrated through dilution calculation records and sample test results.

The fountain solution is purchased in a concentrated form.

The manufacture of the fountain solution recommends a certain dilution to obtain the recommended operating formulation. Quebecor shall prepare the as-applied fountain solution in accordance with the recommended formulation. Alternatively, Quebecor may calculate a formulation using the VOC content of the concentrated fountain solution and a predetermined amount of water to

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



obtain a diluted solution with a VOC content less than the regulated value.

Quebecor generally has specific fountain solution formulations for each press. These formulations typically do not change. As such, Quebecor will complete an initial analytical test of each as-applied, fountain solution to determine the VOC content. The initial analysis will be completed within one year upon issuance of the permit. Following the initial analysis, the fountain solution will be analyzed when the formulation is changed or once every five years upon permit renewal, whichever is sooner.

In order to demonstrate continued compliance with the maximum allowable VOC content of the fountain solution, Quebecor will maintain the following records: (1) Material Safety Data Sheets or other similar certification from the manufacturer of the fountain solution to document the concentrated VOC content, and (2) records of the dilution methods or calculations used to prepare the as-applied fountain solution used in the off-set lithographic presses. These records must be maintained at the facility for a period of five years, and upon request be submitted to the department's representative.

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of the fountain solution are presented in Appendix A, Methods 24, of 40CFR60. Alternate analytical methods must be approved by the commissioner and the USEPA.

The results of any analysis or other procedure used for establishing compliance with this Part must be maintained on-site for a period of 5 years and be made available for review upon request by the Department. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements. Representatives of the Department of Environmental Conservation shall be permitted, during reasonable business hours, to obtain fountain solution samples for the purpose of determining compliance with this Part.

Work Practice Type: PARAMETER OF PROCESS MATERIAL



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Process Material: FOUNTAIN SOLUTION
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 15 percent by weight
Reference Test Method: method 24 (40CFR60)
Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2001.
Subsequent reports are due every 6 calendar month(s).

Condition 58: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

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

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0002
Process: 02B Emission Source: EQ200

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

Item 58.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The off-set lithographic press, identified as Press 200, is operated using a fountain solution with a 15% by weight or less of volatile organic compounds as the compliance method. However, due to a nuisance diesel-like odor from this source and possible opacity exceedances, a catalytic afterburner has been maintained on this source. The catalytic afterburner is equipped with a monitor to measure the temperature rise across the catalytic bed. The outlet temperature is displayed continuously on the operators control panel. Since there is no permanent recording of this data, the facility is required to maintain a log book documenting quarterly measurements of the temperature rise across the catalytic bed. In addition, the facility is required to complete a semi-annual physical inspection of the afterburner to



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

check for cracks, leaks, and air gaps. The catalyst must be sampled and analyzed on an annual basis to determine if the catalyst has been poisoned, masked, or aged. A copy of the preventative maintenance report was submitted with the permit application and is part of this permit by reference.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 675 degrees Fahrenheit

Monitoring Frequency: QUARTERLY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-14: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 227-2.4(d)

Replaces Condition(s) 59

Item 1-14.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0003

Item 1-14.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A boiler tune-up shall be performed annually. The owner or operator of a small boiler shall maintain a log (in the format acceptable to the Department) containing the following information: (1) The date which the equipment was adjusted; and (2) The name, title, and affiliation of the person who adjusted the equipment.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 60: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 227-1.3(a)

Item 60.1:

The Compliance Certification activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Emission Unit: E-G0003

Process: 03A

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 60.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Operators of boilers which fire oil shall not exceed 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity. Compliance with this standard may be determined by EPA Reference Method 9, Continuous Opacity Monitoring System (COMS) data, and/or any other credible evidence. Quebecor has agreed to maintain a certified Method 9 opacity observer on staff. As such, the Department requires Quebecor to perform routine observations of the boilers when oil is used as the fuel source. The observations should be documented and maintained for review.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-15: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 225-2.3

Item 1-15.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0003

Process: 03C



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Item 1-15.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Quebecor is eligible to burn a waste fuel A, identified as NOCO Product RL-2100. The approval is granted based on Quebecor's demonstration of a minimum combustion efficiency of 99.0 percent when burning the waste fuel A.

The source emission testing was completed on July 6, 2000. The average test results indicated a combustion efficiency of 99.95%. Thus, the waste fuel may be burned in the three stationary combustion installations identified in Emission Unit E-G0003. The three combustion installations satisfy the requirement of having a maximum operating heat input capacity of 20 million Btu per hour or greater.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-16: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 225-2.4(b)

Item 1-16.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0003

Process: 03C

Item 1-16.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The NOCO Product RL-2100 is representative of a waste fuel A based on the following criteria, (1) the waste fuel contains between 25 and 250 parts per million (ppm, by weight) lead, (2) the waste fuel meets the limitations of Table 2-1 from this subpart as listed below, and (3) the waste fuel does not contain chemical waste.

Table 2-1 : Fuel Constituents/Property, Allowable concentration.

Polychlorinated Biphenyls (PCB), less than 50 ppm.



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Total Halogens, 1,000 ppm maximum.
Sulfur, 1.5%.
Lead, 250 ppm maximum.
Gross Heat Content, 125,000 (Btu/gal) minimum.

NOCO has provided the Department with fuel analyses to demonstrate compliance with the above limitations. Quebecor shall maintain the NOCO certified fuel receipts on-site for a period of 5 years and be made available for review upon request by the Department. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

Monitoring Frequency: PER DELIVERY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2001.
Subsequent reports are due every 6 calendar month(s).

Condition 1-17: Compliance Certification
Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 225-2.5(a)

Item 1-17.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0003
Process: 03C

Item 1-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Except as provided in subdivision (b) of this section, no person may initiate construction of a new emission source, or modification, or operate an air contamination source in which waste fuel is to be burned until all applicable provisions of this Subpart have been met and the necessary permits have been issued in accordance with Part 201 of this Title.

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-18: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 225-2.6

Item 1-18.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0003

Process: 03C

Item 1-18.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Sale or use of waste fuels A and B. (a) Fuel oil and waste oil, except such fuel containing 50 ppm or more by weight of polychlorinated biphenyls (PCB), may be blended to meet the limitations of Table 2-1 of section 225-2.4 of this subpart. Blending must be performed prior to delivery of the fuel to a facility burning waste fuel A.

(b) The Department also regulates the burning, collection, transport and storage of waste fuel as a solid waste under regulations promulgated pursuant to article 27, titles 3,7 and 9 and article 23 of the Environmental Conservation Law (ECL).

(c) No person may sell, offer for sale, deliver or exchange in trade any waste fuel except to a facility meeting the applicable requirements of this Subpart and the regulations promulgated pursuant to article 27, titles 7 and 9 and article 23 of ECL or to a transporter of waste fuel who is permitted under 6NYCRR Part 364.

(d) No owner or operator of a facility proposing to burn waste fuel or transporter of waste fuel may purchase, accept delivery, pick up or accept in trade any waste fuel unless the facility receiving or proposing to burn waste fuel meets the applicable requirements of this Subpart and the regulations promulgated pursuant to article 27, titles 7 and 9 and article 23 of the ECL and the transporter of waste fuel is permitted under 6NYCRR Part 364.



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Monitoring Frequency: PER DELIVERY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2001.
Subsequent reports are due every 6 calendar month(s).

Condition 1-19: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 225-2.7

Item 1-19.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0003
Process: 03C

Item 1-19.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Department may require the owner and/or operator of an air contamination source burning waste fuel regulated under section 225-2.4 of this subpart to:

- (1) sample, analyze and measure quantities of all waste fuel received and/or burned; and
- (2) monitor emissions and/or operations.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-20: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 231-2.2(a)(4)

Item 1-20.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

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

Item 1-20.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Capping: Yes

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

Monitoring Description:

As part of the original Title V application, Quebecor submitted plans to replace two rotogravure presses, identified as emission sources EQ215 and EQ216, with similar sources, identified as emission sources EQ217 and EQ218. This project was reviewed during the initial Title V application for the applicability to 6NYCRR Part 231-2. The results of the applicability determination concluded the project did not satisfy the definition of a "significant source project" and, thus, was not applicable to a new source review. Specifically, the project did not result in an increase in the Maximum Annual Potential (MAP) of the existing emission unit. As such, a permit condition was imposed to limit the volatile organic compound emissions from emission unit E-G0004, such that the MAP is not exceeded by the project. The permit condition is only applicable to the specific changes of replacing existing sources EQ215 and EQ216 with similar rotogravure presses identified as EQ217 and EQ218. The limit can not be used to install any other additional equipment at the facility. As such, any other potential new projects require a separate new source review determination.

Since completion of the initial Title V permit, Quebecor has replaced the existing sources and began operation of sources EQ217 and EQ218. Quebecor is required to maintain rolling 12-month emission records to demonstrate the total actual annual emissions from emission unit E-G0004 do not exceed the limit imposed by this cap. The emission records must be maintained on-site for a period of 5 years and be made available for review upon request by the Department. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

Other changes that have occurred since completion of the initial Title V permit include the Department's amendment of 6NYCRR Part 231-2. This amendment has affected this permit condition because it was originally permitted under 6NYCRR Part 231-2.2(b)(3) and is now permitted under



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

6NYCRR Part 231-2.2(a)(4).

Parameter Monitored: VOC

Upper Permit Limit: 1775 tons per year

Monitoring Frequency: MONTHLY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 1-21: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 234.3(a)(3)(i)

Replaces Condition(s) 62

Item 1-21.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-21.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

Quebecor utilizes a solvent recovery system to capture and recover VOC emissions from each of the publication rotogravure printing processes at the facility. In accordance with 6NYCRR Part 234.3, the capture system and the air cleaning device must provide for an overall reduction in volatile organic compound emissions of at least 75.0 percent where a publication rotogravure process is employed. As such, the six rotogravure presses are required to satisfy the 75% overall reduction in VOC emissions. In addition, one of the six rotogravure presses is subject to a more stringent regulation, 40CFR60 Subpart QQ, which requires an overall reduction of 84%. Quebecor has chosen to have all of the six presses subject to 40CFR60 Subpart QQ. Thus, the requirement for 6NYCRR Part 234 is superseded by 40CFR60 Subpart QQ. Refer to the compliance methods of 40CFR60 Subpart QQ for

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



demonstration of compliance with 6NYCRR Part 234.3. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INK

Parameter Monitored: SOLVENT RECOVERY RATE

Lower Permit Limit: 75 percent reduction by weight

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 63: control requirements

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 234.3(a)(3)(iv)

Item 63.1:

This Condition applies to Emission Unit: E-G0004

Item 63.2:

The overall removal efficiency is determined by testing the capture efficiency and the removal efficiency of the control equipment, utilizing test methods acceptable to the commissioner.

Condition 64: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 234.4

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 64.2:

Compliance Certification shall include the following monitoring:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The testing, monitoring, and recordkeeping requirements of 6NYCRR Part 234.4 are equivalent to the requirements of 40CFR60 Subpart QQ. As such, refer to the permit conditions for 40CFR60 Subpart QQ for the requirements and compliance demonstration for the overall VOC removal efficiency from the rotogravure process.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 65: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

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

Item 65.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 65.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The solvent recovery systems are designed and operated to adsorb organic vapors from the exhaust air collected from the rotogravure printing processes by passing the gas stream through carbon beds. Each carbon bed has a maximum organic vapor adsorption capacity. The point at which the maximum capacity is reached is called breakthrough. The carbon beds are operated so that any one bed of the total system never reaches the breakthrough point. There are VOC detectors on the outlet of each carbon bed to indicate if high VOC concentrations exist in the gas stream that is leaving the carbon bed and entering the ambient air. A set point of 50 parts per million (ppm) is used to determine when the working capacity of a carbon bed has been reached. Once the working capacity has been reached, the solvent laden air is directed to the next on-line nonsaturated carbon bed and the saturated bed is regenerated by steaming. The VOC detectors are operated



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

at all times the associated solvent recovery systems are operated. The three solvent recovery systems utilize a VOC detector manufactured by the Rosemont Company as the continuous monitoring device. Calibration of the three analyzers using a span gas of 100 ppm toluene is completed on a weekly basis. This information is recorded in a log book along with any variation from the setpoint before resetting.

In addition, the solvent recovery system is backed up by a system that schedules steaming on a time basis to ensure breakthrough does not occur.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 66: Recordkeeping requirements.
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.7(b), NSPS Subpart A

Item 66.1:

This Condition applies to Emission Unit: E-G0004

Item 66.2:

Affected owners or operators shall maintain records of occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

Condition 67: Facility files for subject sources.
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.7(f), NSPS Subpart A

Item 67.1:

This Condition applies to Emission Unit: E-G0004

Item 67.2:

The following files shall be maintained at the facility for all affected sources: all measurements, including continuous monitoring systems, monitoring device, and performance testing measurements; all continuous monitoring system evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part, recorded in permanent form suitable for inspection. The file shall be maintained for at least two years following the date of such measurements, reports, and records.

Condition 68: Compliance with Standards and Maintenance Requirements
Effective between the dates of 02/08/2000 and 02/08/2005

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Applicable Federal Requirement: 40CFR 60.11(d), NSPS Subpart A

Item 68.1:

This Condition applies to Emission Unit: E-G0004

Item 68.2:

At all times, including periods of startup, shutdown, and malfunction, owners and operators of this facility shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department and the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source

Condition 69: Reconstruction.

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.15, NSPS Subpart A

Item 69.1:

This Condition applies to Emission Unit: E-G0004

Item 69.2:

The following shall be submitted to the Administrator prior to reconstruction (as defined in section 60.15):

- 1) a notice of intent to reconstruct 60 days prior to the action;
- 2) name and address of the owner or operator;
- 3) the location of the existing facility;
- 4) a brief description of the existing facility and the components to be replaced;
- 5) a description of the existing air pollution control equipment and the proposed air pollution control equipment;
- 6) an estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new facility;
- 7) the estimated life of the facility after the replacements; and
- 8) a discussion of any economic or technical limitations the facility may have in complying with the applicable standards of performance after the proposed replacements.

Condition 70: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Applicable Federal Requirement: 40CFR 60.432, NSPS Subpart QQ

Item 70.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 70.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No owner or operator shall cause to be discharged into the atmosphere from any affected facility, VOC equal to more than 16 percent of the total mass of VOC solvent and water used at that facility during any one performance averaging period. A performance averaging period is defined as 30 calendar days, one calendar month, or four consecutive weeks.

Parameter Monitored: VOC's

Upper Permit Limit: 16 percent

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 71: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.433(a), NSPS Subpart QQ

Item 71.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 71.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The required compliance demonstration for the rotogravure presses was completed for 30 consecutive days between February 1, 1993 and March 3, 1993. The results of the compliance test were submitted on March 25, 1993 and demonstrated five (5) percent of the total mass of VOC used was discharged into the atmosphere. Quebecor determined compliance using a density corrected liquid volume procedure. Quebecor obtained the density of raw inks and VOC solvents by using data provided by the ink manufacture, at specified temperatures, as a monthly average for the demonstration period. The quantities of ink and solvent were determined based on recording cumulative liquid volume measurements from non-resettable totalizer metering devices.

Parameter Monitored: VOC

Upper Permit Limit: 16 percent

Reference Test Method: Method 24A

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: 30-DAY AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 72: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.433(g), NSPS Subpart QQ

Item 72.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 72.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

If all existing and affected presses located within the same plant boundary use waterborne ink systems or solvent-borne ink systems with solvent recovery systems, the owner or operator may choose to show compliance on a plantwide basis for all the existing and affected presses

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



together.

No separate emission tests on existing facilities and no temporary segregated liquid measurement procedures for affected presses are required for this option. The plantwide performance is determined by one of the procedures specified in 40CFR60.434(g).

Parameter Monitored: VOC

Upper Permit Limit: 16 percent by weight

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: 30-DAY AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 73: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.434(a), NSPS Subpart QQ

Item 73.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Item 73.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

After completion of the performance test required under 40CFR60.8, the owner or operator of any affected facility using waterborne ink systems or solvent-borne ink systems with solvent recovery systems shall record the amount of solvent and water used, solvent recovered, and estimated emission percentage for each performance averaging period. These records shall be maintained for 2 years.

The emission percentage is estimated as follows:

1. The performance averaging period for monitoring of proper operation and maintenance is a calendar month or 4 consecutive weeks, at the option of the owner or operator.
2. If affected facilities share the same raw ink storage/handling system with existing facilities, solvent and water used, solvent recovered, and emission percentages for the combined facilities may be documented. Separate emission percentages for only the affected

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



facilities are not required in this case. The combined emission percentage is compared to the overall average for the existing and affected facilities' emission percentage determined during the most recent performance test.

3. Except as provided in sentence 4 below, temperatures and liquid densities determined during the most recent performance test are used to calculate corrected volumes and mass quantities.

4. The owner or operator may choose to measure temperatures for determination of actual liquid densities during each performance averaging period. A different base temperature may be used for each performance averaging period if desired by the owner or operator.

5. The emission percentage is calculated according to the procedures in section 60.433(b) through (g), whichever applies, or by a comparable calculation which compares the total solvent recovered to the total solvent used at the affected facility.

Parameter Monitored: VOC

Upper Permit Limit: 16 percent by weight

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 74: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.434(a), NSPS Subpart QQ

Item 74.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 74.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Quebecor maintains records of the amount of solvent used, solvent recovered, and estimated solvent recovery percentage for each performance averaging period, to demonstrate continued compliance with 40CFR60 Subpart QQ.



Compliance is demonstrated on a plant-wide basis for all existing and affected facilities combined. Quebecor chooses to use the plant-wide demonstration, since the existing facilities are required by 6NYCRR Part 234 to maintain identical records for demonstration of compliance. As such, Quebecor has accepted a greater control efficiency of 84% for the existing facilities, as opposed to a 75% control efficiency required by 6NYCRR Part 234.

The solvent recovery system provides for an overall reduction in volatile organic compound emissions of at least 84.0 percent. Appendix B of the Title V permit contains a flow chart to demonstrate the method used to determine the overall removal efficiency. The overall removal efficiency of the capture system and air cleaning devices is calculated as the ratio of "recovered solvent" to "solvent used". The "solvent used" consists of solvent present in the ink and dilution solvent. The ink solvent and dilution solvent values are each determined by recording the volume, in gallons, from non-resettable totalizing meters. The recorded ink volumes are multiplied by the density of the ink and by the percent by weight VOC content to obtain the pounds of VOC used in the ink. The pounds of VOC from the ink is then converted to gallons by using the density of the solvent. The ink solvent and dilution solvent are then added together to obtain a total solvent usage in gallons.

The "recovered solvent" is determined by adding the solvent sold, dilution solvent, wash tank solvent, and the gain or loss of the solvent tanks. The solvent sold is determined based on stick measurements of the tanks. The dilution solvent and wash tank solvent are determined by totalizing meters. The gain or loss of solvent from the solvent tanks is determined based on stick measurements of the tanks. The "recovered solvent" value is divided by the "solvent used" value which is then multiplied by 100 to obtain the efficiency of the solvent recovery system.

Quebecor performs a liquid-to-liquid material balance several times throughout the month for internal tracking purposes. In addition, Quebecor completes a monthly summary report to demonstrate continued compliance with the regulations. The liquid-to-liquid material balance is calculated on a facility-wide basis. Appendix B of the Title V permit contains a copy of an internal weekly



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

solvent recovery report. The information from the internal reports are used to prepare a monthly summary report. A copy of a monthly liquid-to-liquid material balance report was included with the permit application and is made part of this permit by reference.

The solvent and ink meters are read several times per month. The mechanical meters are calibrated on a yearly basis. The coreolis meters do not require calibration. Quebecor uses certification from the ink manufacturer to obtain the composition of the ink and solvent for use in the liquid-to-liquid material balance calculations.

Parameter Monitored: SOLVENT RECOVERY RATE

Upper Permit Limit: 84 percent reduction by weight

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 75: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.435(a), NSPS Subpart QQ

Item 75.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 75.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any affected facility using solvent-borne ink systems shall determine the VOC content of the raw inks and related coatings used at the affected facility by:

1. Analysis using Reference Method 24A of routine weekly samples of raw ink and related coatings in each respective storage tank; or
2. Analysis using Reference Method 24A of samples of each



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

shipment of all purchased raw inks and related coatings;
or
3. Determination of the VOC content from the formulation data supplied by the ink manufacturer with each shipment of raw inks and related coatings.

Reference Test Method: Method 24A

Monitoring Frequency: AS REQUIRED - SEE MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 76: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.435(b), NSPS Subpart QQ

Item 76.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 76.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any affected facility using solvent-borne ink systems shall use the results of verification analysis by Reference Method 24A to determine compliance when discrepancies with ink manufacturers' formulation data occur.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 77: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.435(d)(2), NSPS Subpart QQ

Item 77.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

CAS No: 0NY998-00-0 VOC

Item 77.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any affected facility shall determine the density of raw inks, related coatings, and VOC solvents by using literature values, at specified temperatures, acceptable to the Administrator.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 78: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 60.435(e), NSPS Subpart QQ

Item 78.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 78.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

At facilities with both existing and affected publication rotogravure printing presses, both the existing and affected presses are subject to the test methods and procedures specified in paragraphs (a) through (d) of Section 60.435.

Condition 79: Designation of affected sources
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.821(a)(1), Subpart KK

Item 79.1:

This Condition applies to Emission Unit: E-G0004

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Item 79.2:

At a facility which is a major source of HAP emissions, all of the publication rotogravure presses and all affiliated equipment, including proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment, and solvent recovery equipment, are subject to 40CFR63 Subpart KK.

Condition 80: Part 63 General Provisions requirements
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.823, Subpart KK

Item 80.1:

This Condition applies to Emission Unit: E-G0004

Item 80.2:

Table 1 to 40CFR63 Subpart KK provides cross references to the 40CFR Part 63 Subpart A, General Provisions, indicating the applicability of the General Provisions requirements to Subpart KK.

Condition 81: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.824(b)(1)(i), Subpart KK

Item 81.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 81.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Quebecor utilizes a solvent recovery system to capture and recover hazardous air pollutant (HAP) emissions from each of the publication rotogravure printing processes at the facility. The solvent recovery system provides for an overall control of at least 92.0 percent of organic HAP used. Quebecor performs a liquid-to-liquid material balance for each month to demonstrate continued compliance. A copy of a monthly liquid-to-liquid material balance report was submitted with the permit application and is made part of this permit by reference. The

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



overall effective organic HAP control efficiency (Re) is calculated using the following formula:

$$Re = (100) \times \frac{Mvu - Mhu}{Mvu} + \left(\frac{Mvr}{Mvu} \right) \left(\frac{Mhu}{Mvu} \right)$$

Mvu

where,

Mvu = the mass of volatile matter, including water, used in a month, pounds mass

Mhu = the mass of organic HAP used in a month, pounds mass

Mvr = the mass of volatile matter recovered in a month, pounds mass

The mass of volatile matter used consists of VOC present in the ink and dilution solvent. The ink and dilution solvent values are each determined by recording the volume, in gallons, from non-resettable totalizing meters. The recorded volumes are multiplied by the appropriate density and percent VOC content to obtain the mass of VOC used. The ink solvent and dilution solvent are then added together to obtain a total VOC usage in pounds.

The mass of volatile matter recovered may be determined by two different methods. The flow diagram presented in the permit application demonstrates the two methods. Quebecor utilizes method 1 to determine the mass of volatile matter recovered by measuring the solvent sold, dilution solvent used, wash tank solvent used, and the gain or loss of the solvent tanks. The solvent sold is determined based on stick measurements of the tank and compared with metered values obtained from the purchaser of the recovered solvent. The dilution solvent and wash tank solvent are determined by totalizing meters. The gain or loss of solvent from the solvent tanks is determined based on stick measurements of the tanks.

The mass of organic HAP used is determined by multiplying the mass of volatile matter used by the organic HAP weight fraction of the recovered solvent. As stated in the regulation, for purposes of this calculation, the mass fraction of organic HAP present in the recovered volatile

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



matter is assumed to be equal to the mass fraction of organic HAP present in the volatile matter used. Quebecor relies on formulation data provided by the manufacturer on a Certified Product Data Sheet (CPDS) to obtain the weight percent of HAP present in the recovered solvent.

Quebecor operates, maintains, and calibrates totalizing meters, according to manufacturer specifications, that indicate the cumulative amount of ink and solvent materials used. The solvent and ink totalizing meters are read several times per month. The mechanical meters are calibrated on a yearly basis. The coreolis meters do not require calibration.

Parameter Monitored: OVERALL ORGANIC HAP CONTROL EFFICIENCY

Lower Permit Limit: 92 percent reduction by weight

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 82: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.824(b)(1)(i), Subpart KK

Item 82.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 82.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Each publication rotogravure source subject to 40CFR63 Subpart KK shall limit emissions of organic hazardous air pollutants (HAP) to no more than eight percent of the total volatile matter used each month.

Each owner or operator using a solvent recovery device to control emissions shall demonstrate compliance by showing that the HAP emission limitation is achieved by following

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



the procedures from 40CFR63.824(b)(1)(i):

The facility owner shall perform a liquid-liquid material balance for each month as follows. A month is defined as a calendar month or a prespecified period of 28 days to 35 days.

(A) Measure the mass of each ink, coating, varnish, adhesive, primer, solvent, and other material used by the affected source during the month;

(B) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material used by the affected source during the month following the procedure in 40CFR63.827(b)(1);

(C) Determine the volatile matter content, including water, of each ink, coating, varnish, adhesive, primer, solvent, and other material used by the affected source during the month following the procedure in 40CFR63.827(c)(1);

(D) Install, calibrate, maintain, and operate, according to the manufacturer's specifications, a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device shall be initially certified by the manufacturer to be accurate to within +/- 2.0 percent;

(E) Measure the amount of volatile matter recovered for the month;

(F) Calculate the overall effective organic HAP control efficiency (Re) for the month using Equation 1 of 40CFR63.824(b)(1)(i)(F). For the purposes of this calculation, the mass fraction of organic HAP present in the recovered volatile matter is assumed to be equal to the mass fraction of organic HAP present in the volatile matter used;

(G) The affected source is in compliance for the month if Re is at least 92 percent for each month.

Parameter Monitored: OVERALL ORGANIC HAP CONTROL EFFICIENCY

Lower Permit Limit: 92 percent reduction by weight

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 83: Exemption from performance test for solvent recovery devices
Effective between the dates of 02/08/2000 and 02/08/2005**

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Applicable Federal Requirement: 40CFR 63.827(a)(3), Subpart KK

Item 83.1:

This Condition applies to Emission Unit: E-G0004

Item 83.2: An owner or operator using a control device to comply with requirements of 40CFR63.824-63.825 (Printing and Publishing NESHAP) is not required to conduct an initial performance test to demonstrate compliance if the control device is a solvent recovery device and the owner or operator chooses to comply by means of a monthly liquid-liquid material balance.

**Condition 84: Determination of the organic HAP content of organic materials for publication rotogravure sources
Effective between the dates of 02/08/2000 and 02/08/2005**

Applicable Federal Requirement: 40CFR 63.827(b)(1), Subpart KK

Item 84.1:

This Condition applies to Emission Unit: E-G0004

Item 84.2: Each owner or operator of a publication rotogravure facility shall determine the organic HAP weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, and other material used in a publication rotogravure affected source by one of the following three procedures (as specified in paragraphs (b)(1)(i) through (b)(1)(iii) of 40CFR63.827):

1. The owner or operator may test the material in accordance with Method 311 of Appendix A of 40CFR63. The Method 311 determination may be performed by the manufacturer of the material and the results provided to the owner or operator. If these values cannot be determined using Method 311, the owner or operator shall submit an alternative technique for determining their values for approval by the Administrator. The recovery efficiency of the technique must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.
2. The owner or operator may determine the volatile matter content of the material in accordance with 40CFR63.827(c)(1) and use this value for the organic HAP content for all compliance purposes.
3. The owner or operator may rely on formulation data provided by the manufacturer of the material on a Certified Product Data Sheet (CPDS) if:
 - (A) The manufacturer has included in the organic HAP content determination all HAP present at a level greater than 0.1 percent in any raw material used, weighted by the mass fraction of each raw material used in the material, and
 - (B) The manufacturer has determined the HAP content of each raw material present in the formulation by Method 311 of appendix A of 40CFR Part 63, or by an alternate method approved by the Administrator, or by reliance on a CPDS from a raw material supplier prepared in accordance with 40CFR63.827(b)(1)(iii)(A).

In the event of any inconsistency between the Method 311 of appendix A of Part 63 test data and formulation data, that is, if the Method 311 test value is higher, the Method 311 test data shall govern, unless after consultation, an owner or operator demonstrates to the satisfaction of the enforcement authority that the formulation data are correct.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Condition 85: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.827(b)(1), Subpart KK

Item 85.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 85.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Quebecor has elected to rely on formulation data provided by the manufacturer to determine the organic HAP weight-fraction of each ink, coating, solvent, and other material used in the publication rotogravure process. The formulation data is provided on a Certified Product Data Sheet (CPDS) from the manufacturer and conforms with the following requirements:

(i) The manufacturer has included in the organic HAP content determination all HAP present at a level greater than 0.1 percent in any raw material used, weighted by the mass fraction of each raw material used in the material, and

(ii) The manufacture has determined the HAP content of each raw material present in the formulation by Method 311 of appendix A of 40CFR63, or by an alternate method approved by the Administrator, or by reliance on a CPDS from a raw material supplier prepared in accordance with 40CFR63.827(b)(1)(iii)(A).

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 86: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.827(c)(1), Subpart KK

Item 86.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Emission Unit: E-G0004

Item 86.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a publication rotogravure facility shall determine the volatile matter weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material used by using Method 24A of 40CFR60, Appendix A. The Method 24A determination may be performed by the manufacturer of the material and the results provided to the owner or operator. If these values can not be determined using Method 24A, the owner or operator shall submit an alternative technique for determining their values for approval by the Administrator. The owner or operator may rely on formulation data, subject to the provisions of 40CFR63.827(c)(3).

Reference Test Method: 24A or equivalent

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 87: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.827(c)(3), Subpart KK

Item 87.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Item 87.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners or operators may determine the volatile matter content of materials based on formulation data, and may rely on volatile material content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40CFR60, Appendix A, the applicable test method shall govern, unless after consultation, the



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

owner or operator can demonstrate to the satisfaction of the Department that the formulation data are correct.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 88: Subpart A record keeping provisions
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.829(a), Subpart KK

Item 88.1:

This Condition applies to Emission Unit: E-G0004

Item 88.2:

The record keeping provisions of 40CFR Part 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40CFR63 Subpart KK are listed in Table 1 of 40CFR63 Subpart KK.

Condition 89: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.829(b), Subpart KK

Item 89.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Item 89.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to 40CFR Part 63 Subpart KK shall maintain the following records (as specified in paragraphs (b)(1) through (b)(3) of Section 63.829) on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1):

(1) Records specified in 40CFR63.10(b)(2), of all measurements needed to demonstrate compliance with Subpart KK, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

(2) Records specified in 40CFR63.10(b)(3), for each applicability determination performed by the owner or operator in accordance with the requirement in 40CFR63.820(a), and

(3) Records specified in 40CFR63.10(c) for each continuous monitoring system operated by the owner or operator in accordance with the requirements of 40CFR63.828(a).

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 90: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.829(c), Subpart KK

Item 90.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 90.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source which is using a solvent recovery device to comply with Subpart KK and is performing a liquid-liquid material balance for each month in order to demonstrate compliance with Subpart KK shall maintain records of all liquid-liquid material balances performed.

The records shall be kept for a period of five years and shall be maintained in accordance with the requirements of 40CFR63.10(b). The requirements of 40CFR63.10(b) include, but are not limited to, the following:

1. Files of all information shall be maintained in a form suitable and readily available for expeditious inspection and review.
2. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

3. The facility owner shall maintain records of all malfunctions and the actions taken to correct these malfunctions.

4. The facility owner shall maintain records of all measurements related to calibrations, adjustments, and maintenance on the system.

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH TOTAL

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 91: Subpart A reporting requirements
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.830(a), Subpart KK

Item 91.1:

This Condition applies to Emission Unit: E-G0004

Item 91.2: The reporting provisions of 40CFR Part 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40CFR Part 63 Subpart KK are listed in Table 1 of Subpart KK.

Condition 92: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.830(b)(5), Subpart KK

Item 92.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Item 92.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to 40CFR63 Subpart KK that is using a control device to comply with Subpart KK shall submit start-up, shutdown, and malfunction reports as specified in Section 63.10(d)(5).

The start-up, shutdown, and malfunction report shall be



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

submitted semiannually. The report shall be delivered or postmarked by the 30th day following the end of each calendar half. Reports shall only be required if a start-up, shutdown, or malfunction occurred during the reporting period.

If actions taken by an owner or operator during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in Section 63.6(e)(3), the owner or operator shall state such information in the report. The start-up, shutdown, or malfunction plan shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that shall be submitted to the Department.

Separate start-up, shutdown, or malfunction reports are not required if the information is included in the semiannual report for the affected source

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2000.

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

**Condition 93: Standards apply during all tank operation
Effective between the dates of 02/08/2000 and 02/08/2005**

Applicable Federal Requirement: 40CFR 63.342(b)(1), Subpart N

Item 93.1:

This Condition applies to Emission Unit: E-G0005

Item 93.2:

The emission limits of 40CFR63.342 apply only during tank operation, and also apply during periods of start-up and shutdown as these are routine occurrences for affected sources subject to 40CFR63 Subpart N. The emission limitations do not apply during periods of malfunction, but the work practice standards that address operation and maintenance and that are required by 40CFR63.342(f) must be followed during malfunctions.

**Condition 95: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005**

Applicable Federal Requirement: 40CFR 63.342(c)(2)(i), Subpart N



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Item 95.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Item 95.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

An owner or operator may demonstrate the size of a hard chrome electroplating facility through the definitions in 40CFR63.341(a).

Alternatively, an owner or operator of a facility with a maximum cumulative potential rectifier capacity of 60 million ampere-hours/ year or more may be considered small if the actual cumulative rectifier capacity is less than 60 million ampere hours.

The owner or operator may demonstrate the actual cumulative rectifier capacity by accepting a federally-enforceable limit on the maximum potential rectifier capacity of a hard chromium electroplating facility and maintaining monthly records in accordance with 40CFR63.346(b)(12) to demonstrate that the limit has not been exceeded. The actual cumulative rectifier capacity for the previous 12-month rolling period shall be tabulated monthly by adding the capacity for the current month to the capacities for the previous 11 months.

Parameter Monitored: CUMULATIVE POTENTIAL RECTIFIER CAPACITY

Upper Permit Limit: 60 millions of amp hours per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2001.

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

Condition 96: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.342(c)(2)(i), Subpart N

Item 96.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Emission Unit: E-G0005

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 96.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The potential cumulative rectifier capacity of each chromium electroplating tank is greater than 60 million ampere-hours per year. The size of these rectifiers classify the tanks as large electroplating facilities. Quebecor has chosen to be considered a small electroplating facility by demonstrating the actual cumulative rectifier capacity is less than 60 million amp-hr/yr for each rectifier. This has been demonstrated by installing and using a nonresettable ampere-hr meter on each rectifier. Quebecor is required to keep monthly records of actual ampere-hr usage for each rectifier for the life of the source. In addition, Quebecor is required to compute the actual cumulative rectifier capacity for each 12-month rolling period. This shall be tabulated by adding the capacity for the current month to the capacities for the previous 11 months.

If the monthly records show the actual cumulative rectifier capacity exceed the 60 million ampere-hr/yr limit, the source must comply with the emission limit of 0.015 milligrams of total chromium per dry standard cubic meter of ventilation air. Compliance must be demonstrated no later than one year after the month in which monthly records show the 60 million ampere-hr/yr limit is exceeded.

Process Material: PLATED PRODUCT

Parameter Monitored: CUMULATIVE POTENTIAL RECTIFIER CAPACITY

Upper Permit Limit: 60 millions of amp hours per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 97: Exceedance of small hard chrome electroplating cap
Effective between the dates of 02/08/2000 and 02/08/2005**



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Applicable Federal Requirement: 40CFR 63.342(c)(2)(ii), Subpart N

Item 97.1:

This Condition applies to Emission Unit: E-G0005

Item 97.2:

Once the monthly records required to be kept by section 63.346(b)(12) and by section 63.342(c)(2) show that the actual cumulative rectifier capacity over the previous 12-month rolling period corresponds to the large designation, the owner or operator is subject to the emission limitation identified in section 63.342(c)(1)(i) (0.015 milligrams of total chromium per dry standard cubic meter of ventilation air), in accordance with the compliance schedule of section 63.343(a)(5)

**Condition 98: Applicability of work practice standards
Effective between the dates of 02/08/2000 and 02/08/2005**

Applicable Federal Requirement: 40CFR 63.342(f)(1), Subpart N

Item 98.1:

This Condition applies to Emission Unit: E-G0005

Item 98.2:

The work practice standards of 40CFR63.342 address operation and maintenance practices. All owners or operators subject to the standards in section 63.342(c) and 63.342(d) are subject to these work practice standards.

At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by paragraph (f)(3) of section 63.342.

Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan required by paragraph (f)(3) of section 63.342.

Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emission limitations or other requirements in relevant standards.

**Condition 99: Acceptable work practices
Effective between the dates of 02/08/2000 and 02/08/2005**

Applicable Federal Requirement: 40CFR 63.342(f)(2), Subpart N

Item 99.1:

This Condition applies to Emission Unit: E-G0005

Item 99.2:

The work practice standards of Section 63.342 address operation and maintenance practices. All owners or operators subject to the standards in paragraph (c) and (d) of section 63.342 are subject to these work practices.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source.

Based on the results of a determination made under 63.342(f)(2)(i), the Administrator may require that an owner or operator of an affected source make changes to the operation and maintenance plan required by 63.342(f)(3) for that source. Revisions may be required if the Administrator finds that the plan:

- (A) Does not address a malfunction that has occurred;
- (B) Fails to provide for the operation of the affected source, the air pollution control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or
- (C) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as possible.

Condition 100: Operation and maintenance plan
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.342(f)(3), Subpart N

Item 100.1:

This Condition applies to Emission Unit: E-G0005

Item 100.2:

The owner or operator of an affected source subject to the work practices of 40CFR63.342(f) shall prepare an operation and maintenance plan to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's Title V permit, if and when a Title V permit is required.

The plan shall include the following elements:

- (A) The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emission limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment;
- (B) For sources using an add-on air pollution control device or monitoring equipment to comply with Subpart N, the plan shall incorporate the work practice standards for that device or monitoring equipment, as identified in Table 1 of Subpart N, if the equipment used is identified in Table 1;
- (C) If the specific equipment used is not identified in Table 1 of Subpart N, the plan shall incorporate proposed work practice standards. These proposed work practice standards shall be submitted to the Administrator for approval as part of the submittal required under section 63.343(d);
- (D) The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and
- (E) The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions.

If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.

Recordkeeping associated with the operation and maintenance plan is identified in section 63.346(b).

Reporting associated with the operation and maintenance plan is identified in sections 63.347 (g) and (h) and paragraph (f)(3)(iv) of section 63.342.

If actions taken by the owner or operator during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by paragraph (f)(3)(i) of section 63.342, the owner or operator shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator.

The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the source is no longer subject to the provisions of subpart N. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Administrator for a period of 5 years after each revision to the plan.

To satisfy the requirements of paragraph (f)(3) of section 63.342, the owner or operator may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of section 63.342.

Condition 101: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.342(f)(3), Subpart N

Item 101.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 101.2:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the work practice standard requirements, Quebecor prepared an operation and maintenance plan for the electroplating tanks. The plan specifies the operation and maintenance of the tanks, use of the fume suppressant, and operation of the mist eliminators. In addition, the plan includes a summary of the work practice standards to be followed for each control technique. The results of the work practice standard check lists will be evaluated to ensure malfunctions due to poor maintenance and other preventable conditions do not occur. A copy of the manual was submitted with the permit application and is made part of this permit by reference.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 102: Compliance deadline for small hard chromium electroplating facilities that exceed the small facility threshold in the future

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.343(a)(5), Subpart N

Item 102.1:

This Condition applies to Emission Unit: E-G0005

Item 102.2:

An owner or operator of an existing hard chromium electroplating tank or tanks located at a small, hard chromium electroplating facility that increases its maximum cumulative potential rectifier capacity, or its actual cumulative rectifier capacity, such that the facility becomes a large, hard chromium electroplating facility must comply with the requirements of section 63.342(c)(1)(i) for all hard chromium electroplating tanks at the facility no later than 1 year after the month in which monthly records required by sections 63.342(c)(2) and 63.346(b)(12) show that the large designation is met, or by the compliance date specified in paragraph (a)(1)(ii) of section 63.343, whichever is later.

Condition 105: Test methods for initial performance test

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.344(e), Subpart N

Item 105.1:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

This Condition applies to Emission Unit: E-G0005

Item 105.2:

Each owner or operator of a facility that is subject to the provisions of 40CFR63 Subpart N and is required by §63.343(b) to conduct an initial performance test shall use the test methods identified in section 63.344 to demonstrate compliance with the standards in §63.342.

Method 306 or Method 306A, "Determination of Chromium Emissions From Decorative and Hard Chromium Electroplating and Anodizing Operations," from appendix A of Part 63 shall be used to determine the chromium concentration from hard or decorative chromium electroplating tanks or chromium anodizing tanks. The sampling time and sample volume for each run of Methods 306 and 306A shall be at least 120 minutes and 1.70 dscm (60 dscf), respectively. Methods 306 and 306A, allow the measurement of either total chromium or hexavalent chromium emissions. For the purposes of the Subpart N emission standard, sources using chromic acid baths can demonstrate compliance with the emission limits of §63.342 by measuring either total chromium or hexavalent chromium. Hence, the hexavalent chromium concentration measured by these methods is equal to the total chromium concentration for the affected operations.

The California Air Resources Board (CARB) Method 425 (which is available by contacting the California Air Resources Board, 1102 Q Street, Sacramento, California 95814) may be used to determine the chromium concentration from hard and decorative chromium electroplating tanks and chromium anodizing tanks if the following conditions are met:

- (i) If a colorimetric analysis method is used, the sampling time and volume shall be sufficient to result in 33 to 66 micrograms of catch in the sampling train.
- (ii) If Atomic Absorption Graphite Furnace (AAGF) or Ion Chromatography with a Post-column Reactor (ICPCR) analyses were used, the sampling time and volume should be sufficient to result in a sample catch that is 5 to 10 times the minimum detection limit of the analytical method (i.e., 1.0 microgram per liter of sample for AAGF and 0.5 microgram per liter of sample for ICPCR).
- (iii) In the case of either of the above two paragraphs ((i) or (ii)), a minimum of 3 separate runs must be conducted. The other requirements of §63.7 that apply to affected sources, as indicated in Table 1 of Subpart N, must also be met.

Method 306B, "Surface Tension Measurement and Recordkeeping for Tanks Used at Decorative Chromium 390 Electroplating and Anodizing Facilities," from appendix A Part 63 shall be used to measure the surface tension of electroplating and anodizing baths.

Alternate test methods may also be used if the method has been validated using Method 301 from appendix A of Part 63 and if approved by the Administrator. Procedures for requesting and obtaining approval are contained in §63.7(f).

Condition 108: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.346(a), Subpart N

Item 108.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Emission Unit: E-G0005

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 108.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each affected source subject to 40CFR 63 Subpart N shall fulfill all recordkeeping requirements outlined in section 63.346 and in the General Provisions to 40CFR 63 (40CFR63 Subpart A).

The records specific for Subpart N are listed as items numbered 1 through 16 under section 63.346(b).

Subpart A requirements are specified in Table 1 to Subpart N. They are listed as follows:

63.10(a)(3): If any State requires a report that contains all the information required in a report listed in Subpart A, an owner or operator may send the Administrator a copy of the report sent to the State to satisfy the requirements of Subpart A for that report.

63.10(a)(4)(ii): After a State has been delegated the authority to implement and enforce recordkeeping and reporting requirements established under this part, the owner or operator of an affected source in such State subject to such requirements shall submit reports to the delegated State authority (which may be the same as the permitting authority). In addition, if the delegated (permitting) authority is the State, the owner or operator shall send a copy of each report submitted to the State to the appropriate Regional Office of the EPA, as specified in paragraph (a)(4)(i) of section 63.10. The Regional Office may waive this requirement for any reports at its discretion.

63.10(a)(5): If an owner or operator of an affected source in a State with delegated authority is required to submit periodic reports under Part 63 to the State, and if the State has an established timeline for the submission of periodic reports that is consistent with the reporting frequency(ies) specified for such source under Part 63,

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



the owner or operator may change the dates by which periodic reports under Part 63 shall be submitted (without changing the frequency of reporting) to be consistent with the State's schedule by mutual agreement between the owner or operator and the State. For each relevant standard established pursuant to section 112 of the Act, the allowance in the previous sentence applies in each State beginning 1 year after the affected source's compliance date for that standard. Procedures governing the implementation of this provision are specified in §63.9(i).

63.10(a)(6): If an owner or operator supervises one or more stationary sources affected by more than one standard established pursuant to section 112 of the Act, he/she may arrange by mutual agreement between the owner or operator and the Administrator (or the State permitting authority) a common schedule on which periodic reports required for each source shall be submitted throughout the year. The allowance in the previous sentence applies in each State beginning 1 year after the latest compliance date for any relevant standard established pursuant to section 112 of the Act for any such affected source(s). Procedures governing the implementation of this provision are specified in §63.9(i).

63.10(a)(7): If an owner or operator supervises one or more stationary sources affected by standards established pursuant to section 112 of the Act (as amended November 15, 1990) and standards set under part 60, part 61, or both such parts of this chapter, he/she may arrange by mutual agreement between the owner or operator and the Administrator (or the State permitting authority) a common schedule on which periodic reports required by each relevant (i.e., applicable) standard shall be submitted throughout the year. The allowance in the previous sentence applies in each State beginning 1 year after the stationary source is required to be in compliance with the relevant section 112 standard, or 1 year after the stationary source is required to be in compliance with the applicable part 60 or part 61 standard, whichever is latest. Procedures governing the implementation of this provision are specified in §63.9(i).

63.10(b): The owner or operator of an affected source subject to the provisions of Part 63 shall maintain files of all information (including all reports and notifications) required by Part 63 recorded in a form



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 109: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.346(b), Subpart N

Item 109.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 109.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Quebecor shall maintain the following records for the two hard chromium electroplating tanks:

- (1) Inspection records for the add-on air pollution control device and monitoring equipment, to document the inspection and maintenance required by the work practice standards have taken place. The records can take the form of a checklist and should identify the device inspected, the date of the inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
- (2) Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment;
- (3) Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment;
- (4) Records of actions taken during periods of

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



- malfunction when such actions are inconsistent with the operation and maintenance plan;
- (5) Test reports documenting results of all performance tests;
 - (6) Records of surface tension measurements, number of cylinders processed per hour, and magnehelic gauge readings that are used to demonstrate compliance with the standard including the date and time the data are collected;
 - (7) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment;
 - (8) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment;
 - (9) The total process operating time of the affected source during the reporting period;
 - (10) Records of the actual cumulative rectifier capacity of the hard chromium electroplating tanks expended during each month of the reporting period, and the total capacity expended to date for a reporting period;
 - (11) Records of the date and time that fume suppressants are added to the electroplating bath;
 - (12) All documentation supporting the notifications and reports required by 40CFR63.9, 40CFR63.10, and 40CFR63.347.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 110: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.346(c), Subpart N

Item 110.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Item 110.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required by 40CFR63 Subpart N shall be maintained for a period of 5 years in accordance with section 63.10(b)(1).

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 111: Reporting Requirements

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.347(a), Subpart N

Item 111.1:

This Condition applies to Emission Unit: E-G0005

Item 111.2:

The owner or operator of each affected source subject to 40CFR63 Subpart N shall fulfill all reporting requirements outlined in section 63.347 and in the General Provisions to 40 CFR part 63. General Provisions requirements are identified in Table 1 of Subpart N.

These reports shall be made to the Administrator at the appropriate address as identified in §63.13 or to the delegated State authority.

(1) Reports may be sent by U.S. mail, fax, or by another courier.

(i) Submittals sent by U.S. mail shall be postmarked on or before the specified date.

(ii) Submittals sent by other methods shall be received by the Administrator on or before the specified date.

(2) If acceptable to both the Administrator and the owner or operator of an affected source, reports may be submitted on electronic media.

Condition 112: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.347(g)(1), Subpart N

Item 112.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Item 112.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Monitoring Description:

The owner or operator of an affected source that is subject to 40CFR63 Subpart N and is located at a major source site shall submit a summary report to the Department of Environmental Conservation to document the ongoing compliance status of the affected source.

The report shall contain the information identified in paragraph (g)(3) of section 63.347, and shall be submitted semiannually, except when:

- (i) The Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or
- (ii) The monitoring data collected by the owner or operator of the affected source in accordance with §63.343(c) show that the emission limit has been exceeded, in which case quarterly reports shall be submitted.

Once an owner or operator of an affected source reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency under paragraph (g)(2) of section 63.347 is approved.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2000.

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

Condition 113: Requests to reduce the frequency of ongoing compliance status reports

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.347(g)(2), Subpart N

Item 113.1:

This Condition applies to Emission Unit: E-G0005

Item 113.2:

An owner or operator who is required to submit ongoing compliance status reports on a quarterly (or more frequent basis) may reduce the frequency of reporting to semiannual if all of the following conditions are met:

- (A) For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods), the ongoing compliance status reports demonstrate that the affected source is in compliance with the relevant emission limit;



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

- (B) The owner or operator continues to comply with all applicable recordkeeping and monitoring requirements of subpart A and Subpart N of Part 63; and
- (C) The Administrator does not object to a reduced reporting frequency for the affected source, as provided in paragraphs (g)(2) (ii) and (iii) of section 63.347.

The frequency of submitting ongoing compliance status reports may be reduced only after the owner or operator notifies the Administrator in writing of his or her intention to make such a change, and the Administrator does not object to the intended change. In the absence of a notice of disapproval within 45 days, approval is automatically granted.

As soon as the monitoring data required by §63.343(c) show that the source is not in compliance with the relevant emission limit, the frequency of reporting shall revert to quarterly, and the owner shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the owner or operator may again request approval from the Administrator to reduce the reporting frequency as allowed by paragraph (g)(2) of section 63.347.

Condition 114: Compliance Certification
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.347(g)(3), Subpart N

Item 114.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Item 114.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected source for which compliance monitoring is required in accordance with 40CFR63 §63.343(c) shall prepare a summary report to document the ongoing compliance status of the source. The report shall be submitted semiannually, unless more or less frequent reporting has been established based on the criteria of 40CFR63.347(g)(1).

The report must contain the following information:

- (1) The company name and address of the affected source;
- (2) An identification of the operating parameter that is monitored for compliance determination, as required by §63.343(c);
- (3) The relevant emission limitation for the affected

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



- source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by paragraph (e) of section 63.347;
- (4) The beginning and ending dates of the reporting period;
- (5) A description of the type of process performed in the affected source;
- (6) The total operating time of the affected source during the reporting period;
- (7) If the affected source is a hard chromium electroplating tank and the owner or operator is limiting the maximum cumulative rectifier capacity in accordance with §63.342(c)(2), the actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis;
- (8) A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
- (9) A certification by a responsible official, as defined in 40CFR63 §63.2, that the work practice standards in §63.342(f) were followed in accordance with the operation and maintenance plan for the source;
- (10) If the operation and maintenance plan required by §63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by §63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed;
- (11) A description of any changes in monitoring, processes, or controls since the last reporting period;
- (12) The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
- (13) The date of the report.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Reports due 30 days after the reporting period.
The initial report is due 7/30/2000.
Subsequent reports are due every 6 calendar month(s).

Condition 115: Reporting for facilities using more than one monitoring device to comply with Subpart N
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.347(g)(4), Subpart N

Item 115.1:

This Condition applies to Emission Unit: E-G0005

Item 115.2:

When more than one monitoring device is used to comply with the continuous compliance monitoring required by 40CFR63 §63.343(c), the owner or operator shall report the results as required for each monitoring device. However, when one monitoring device is used as a backup for the primary monitoring device, the owner or operator shall only report the results from the monitoring device used to meet the monitoring requirements of Subpart N. If both devices are used to meet these requirements, then the owner or operator shall report the results from each monitoring device for the relevant compliance period.

Condition 1-22: Emissions from new emission sources and/or modifications not specified by Table 2
Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 212.4(b)

Replaces Condition(s) 132

Item 1-22.1:

This Condition applies to Emission Unit: E-G0005
Process: 05A

Item 1-22.2:

For gases and liquid particulates with an environmental rating of A, B, or C and for solid particulates with an environmental rating of A, where the emission rate potential is not shown in Table 2 the permissible emission rate shall be specified by the commissioner.

Condition 1-24: Compliance Certification
Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.342(c)(1)(i), Subpart N

Item 1-24.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005
Process: 05A Emission Source: CHR03



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-24.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

During tank operation, each owner or operator of a new affected source shall control chromium emissions discharged to the atmosphere from that affected source by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.015 milligrams of total chromium per dry standard cubic meter of ventilation air. The testing, reporting, and monitoring requirements needed to demonstrate compliance with this standard are specified in sections 40CFR63.343 through 40CFR63.347. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

Parameter Monitored: CHROMIUM

Upper Permit Limit: 0.015 milligrams per dry standard
cubic meter

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 1-25: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.343(a)(2), Subpart N

Item 1-25.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: CHR03

Regulated Contaminant(s):



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

CAS No: 007440-47-3 CHROMIUM

Item 1-25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a new or reconstructed affected source that has initial startup after January 25, 1995, shall comply immediately upon startup of the source.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-26: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.343(b)(1), Subpart N

Item 1-26.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: CHR03

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

An owner or operator of an affected source subject to the requirements of this subpart is required to conduct an initial performance test as required under 40CFR63.7, using the procedures and test methods listed in 40CFR63.7 and 40CFR63.344.

Quebecor has completed the performance test for the chromium electroplating tank on October 25 and October 26, 2000. The test results demonstrated compliance with total chromium emissions of 0.0064 mg/dscm. The maximum surface tension measurement established during the performance test was 23.0 dynes/cm.

Parameter Monitored: CHROMIUM



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Upper Permit Limit: 0.015 milligrams per dry standard
cubic meter

Reference Test Method: EPA method 306

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-27: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.343(c)(5), Subpart N

Item 1-27.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: CHR03

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-27.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

During the initial performance test, the owner or operator of an affected source complying with the emission limitations in §63.342 through the use of a wetting agent in the electroplating or anodizing bath shall determine the outlet chromium concentration using the procedures in §63.344(c).

The owner or operator shall establish as the site-specific operating parameter the surface tension of the bath using Method 306B, appendix A of Part 63, setting the maximum value that corresponds to compliance with the applicable emission limitation.

In lieu of establishing the maximum surface tension during the performance test, the owner or operator may accept 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation. However, the owner or operator is exempt from conducting a performance test only if the criteria of paragraph (b)(2) of Section 63.343 are met.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



On and after the date on which the initial performance test is required to be completed under §63.7, the owner or operator of an affected source shall monitor the surface tension of the electroplating or anodizing bath. Operation of the affected source at a surface tension greater than the value established during the performance test, or greater than 45 dynes/cm if the owner or operator is using this value in accordance with paragraph (c)(5)(i) of section 63.343, shall constitute noncompliance with the standards.

The surface tension shall be monitored according to the following schedule:

(A) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of Part 63.

(B) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs.

The minimum frequency of monitoring allowed by Subpart N is once every 40 hours of tank operation.

(C) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (c)(5)(ii)(B) of section 63.343.

Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures of paragraphs (c)(5)(ii) (B) and (C) of section 63.343.

Parameter Monitored: SURFACE TENSION

Upper Permit Limit: 23 dynes per centimeter

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 1-23: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.344(d)(1), Subpart N

Item 1-23.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: CHR03

Regulated Contaminant(s):

CAS No: 007738-94-5 CHROMIC ACID

Item 1-23.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The chromium electroplating tank, identified as emission source CHR03, is equipped with an alternate emission control device consisting of a plate and baffle scrubber followed by a mesh pad scrubber used to catch droplets of chromium mist. Magnehelic gauges are installed to measure the pressure drop across the mesh pad scrubber.

During the performance test, the magnehelic pressure drop reading for the mesh pad scrubber was 0.5 inches of water.

The Department will require recording the pressure readings of the mesh pad scrubber a minimum of one time during each day of operation. The magnehelic readings from the mesh pad scrubber will be used to monitor compliance. If the pressure readings change more than +/- 1 inch of water column from the performance test values, then this will be considered an indication of further inspection.

The pressure drop readings shall be documented, maintained on-site for a period of 5 years, and be made available for review upon request by the Department. As specified in



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: .25 inches of water
Upper Permit Limit: 1.5 inches of water
Monitoring Frequency: DAILY
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2001.
Subsequent reports are due every 6 calendar month(s).

Condition 1-28: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.344(d)(1), Subpart N

Item 1-28.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005
Process: 05A Emission Source: CHR03

Regulated Contaminant(s):
CAS No: 007440-47-3 CHROMIUM

Item 1-28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

During the performance test, the facility chose to limit the number of rotogravure cylinders processed through the plating tank. A maximum of two (2) cylinders per hour were electroplated during the performance test. As such, the facility is limited to electroplating a maximum of two (2) rotogravure cylinders per hour. The facility will maintain a log book to document the date and time each cylinder is electroplated in the tank. The logbook shall be maintained on-site for a period of 5 years, and be made available for review upon request by the Department. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

Work Practice Type: PROCESS MATERIAL THRUPUT

Upper Permit Limit: 2 items

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 1-29: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.345(b), Subpart N

Item 1-29.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: CHR03

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a new or reconstructed affected source is subject to 40CFR63.5(a), (b)(1), (b)(5), (b)(6), and (f)(1).

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-30: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.345(b)(1), Subpart N



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Item 1-30.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: CHR03

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

After January 25, 1995, whether or not an approved permit program is effective in the State in which an affected source is (or would be) located, no person may construct a new affected source or reconstruct an affected source subject to this subpart, without submitting a notification of construction or reconstruction to the Administrator.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-31: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.345(b)(2), Subpart N

Item 1-31.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: CHR03

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The notification of construction or reconstruction required under paragraph (b)(1) of this section shall include:

(i) The owner or operator's name, title, and

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



address;

(ii) The address (i.e., physical location) or proposed address of the affected source of the affected source if different from the owner's or operator's;

(iii) A notification of intention to construct a new affected source or make any physical or operational changes to an affected source that may meet or has been determined to meet the criteria for a reconstruction as defined in 40CFR63.2;

(iv) An identification of subpart N of this part as the basis for the notification;

(v) The expected commencement and completion dates of the construction or reconstruction;

(vi) The anticipated date of (initial) startup of the affected source;

(vii) The type of process operation to be performed (hard or decorative chromium electroplating, or chromium anodizing);

(viii) A description of the air pollution control technique to be used to control emissions from the affected source, such as preliminary design drawings and design capacity if an add-on air pollution control device is used; and

(ix) An estimate of emissions from the source based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emission limits of this subpart. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-32: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.345(b)(4), Subpart N

Item 1-32.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: CHR03

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Item 1-32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a new or reconstructed affected source that submits a notification in accordance with paragraphs (b)(1) through (3) of this section is not subject to approval by the Administrator. Construction or reconstruction is subject only to notification and can begin upon submission of a complete notification.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-33: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.345(b)(5)(i), Subpart N

Item 1-33.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: CHR03

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

After January 25, 1995, whether or not an approved permit program is effective in the State in which an affected source is (or would be) located, an owner or operator of a new or reconstructed affected source shall submit the notification of construction or reconstruction required by paragraph of (b)(1) of this section according to the following schedule:

(i) If construction or reconstruction commences after January 25, 1995, the notification shall be submitted as soon as practicable before the construction or reconstruction is planned to commence.

Monitoring Frequency: AS REQUIRED - SEE MONITORING



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-34: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.347(c)(2), Subpart N

Item 1-34.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: CHR03

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a new or reconstructed affected source that has an initial startup after January 25, 1995 shall submit an initial notification (in addition to the notification of construction or reconstruction required by 40CFR63.345(b)), as follows:

(ii) A notification of the date when construction or reconstruction was commenced, shall be submitted no later than 30 calendar days after such date, if construction or reconstruction was commenced after January 25, 1995; and

(iii) A notification of the actual date of startup of the source shall be submitted within 30 calendar days after such date.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-35: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.342(c)(1)(ii), Subpart N

Item 1-35.1:

The Compliance Certification activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Emission Unit: E-G0005

Process: 05A

Emission Source: NECHR

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-35.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

During tank operation, each owner or operator of an existing affected source at a small facility, as defined by 40CFR63.341(a), shall control chromium emissions discharged to the atmosphere from that affected source by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.03 milligrams of total chromium per dry standard cubic meter of ventilation air. The testing, reporting, and monitoring requirements needed to demonstrate compliance with this standard are specified in sections 40CFR63.343 through 40CFR63.347. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

Parameter Monitored: CHROMIUM

Upper Permit Limit: 0.03 milligrams per dry standard
cubic meter

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 1-36: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.343(b)(1), Subpart N

Item 1-36.1:

The Compliance Certification activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Emission Unit: E-G0005

Process: 05A

Emission Source: NECHR

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

An owner or operator of an affected source subject to the requirements of this subpart is required to conduct an initial performance test as required under 40CFR63.7, using the procedures and test methods listed in 40CFR63.7 and 40CFR63.344.

Quebecor completed the performance test for the chromium electroplating tank on May 25, 1997 and July 17, 1997. The test results demonstrated compliance with total chromium emissions of 0.008 mg/dscm. The maximum surface tension measurement established during the performance test was 32 dynes/cm.

Parameter Monitored: CHROMIUM

Upper Permit Limit: 0.03 milligrams per dry standard cubic meter

Reference Test Method: EPA method 306

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-37: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.343(c)(5), Subpart N

Item 1-37.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: NECHR

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-37.2:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Compliance Certification shall include the following monitoring:

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

Monitoring Description:

During the initial performance test, the owner or operator of an affected source complying with the emission limitations in §63.342 through the use of a wetting agent in the electroplating or anodizing bath shall determine the outlet chromium concentration using the procedures in §63.344(c).

The owner or operator shall establish as the site-specific operating parameter the surface tension of the bath using Method 306B, appendix A of Part 63, setting the maximum value that corresponds to compliance with the applicable emission limitation.

In lieu of establishing the maximum surface tension during the performance test, the owner or operator may accept 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation. However, the owner or operator is exempt from conducting a performance test only if the criteria of paragraph (b)(2) of Section 63.343 are met.

On and after the date on which the initial performance test is required to be completed under §63.7, the owner or operator of an affected source shall monitor the surface tension of the electroplating or anodizing bath. Operation of the affected source at a surface tension greater than the value established during the performance test, or greater than 45 dynes/cm if the owner or operator is using this value in accordance with paragraph (c)(5)(i) of section 63.343, shall constitute noncompliance with the standards.

The surface tension shall be monitored according to the following schedule:

(A) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of Part 63.

(B) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs.

The minimum frequency of monitoring allowed by Subpart N is once every 40 hours of tank operation.

(C) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (c)(5)(ii)(B) of section 63.343.

Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures of paragraphs (c)(5)(ii) (B) and (C) of section 63.343.

Parameter Monitored: SURFACE TENSION

Upper Permit Limit: 32 dynes per centimeter

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 1-38: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.344(d)(1), Subpart N

Item 1-38.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: NECHR

Regulated Contaminant(s):

CAS No: 007738-94-5

CHROMIC ACID

Item 1-38.2:

Compliance Certification shall include the following monitoring:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

During the performance test, the facility and the Department agreed to limit the number of rotogravure cylinders processed through the electroplating tank. A maximum of one (1) cylinder per hour was electroplated during the performance test. As such, the facility is limited to electroplating a maximum of one (1) rotogravure cylinder per hour. The facility is required to maintain a log book to document the date and time each cylinder is electroplated. The logbook shall be maintained on-site for a period of 5 years, and be made available for review upon request by the Department. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

Work Practice Type: PROCESS MATERIAL THRUPUT

Upper Permit Limit: 1 items

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 1-39: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.344(d)(1), Subpart N

Item 1-39.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: NECHR

Regulated Contaminant(s):

CAS No: 007738-94-5

CHROMIC ACID

Item 1-39.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



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

Monitoring Description:

The chromium electroplating tank, identified as emission source NECHR, is equipped with an alternate emission control device consisting of a plate and baffle scrubber followed by two mesh pad scrubbers used to catch droplets of chromium mist. Magnehelic gauges are installed to measure the pressure drop across each mesh pad scrubber.

During the performance test, the magnehelic pressure drop readings for the two mesh pad scrubbers ranged between 2.0 and 2.5 inches of water for the #1 mesh pad scrubber and ranged between 0.25 and 0.5 inches of water for the #2 mesh pad scrubber.

Due to the infrequent use of the NECHR chromium tank, the Department will require recording the pressure readings of the mesh pad scrubbers a minimum of one time during each day of operation.

The magnehelic readings from the mesh pad scrubbers will be used to monitor compliance of the NECHR. If the pressure readings change more than +/- of 1 inch of water column from the performance test values, then this will be considered an indication of further inspection.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 0.15 inches of water

Upper Permit Limit: 3.5 inches of water

Monitoring Frequency: DAILY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 1-40: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.342(c)(1)(ii), Subpart N

Item 1-40.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Process: 05A

Emission Source: RDCHR

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-40.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

During tank operation, each owner or operator of an existing affected source at a small facility, as defined by 40CFR63.341(a), shall control chromium emissions discharged to the atmosphere from that affected source by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.03 milligrams of total chromium per dry standard cubic meter of ventilation air. The testing, reporting, and monitoring requirements needed to demonstrate compliance with this standard are specified in sections 40CFR63.343 through 40CFR63.347. As specified in 6NYCRR Part 201-6.5(c)(3), Quebecor is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

Parameter Monitored: CHROMIUM

Upper Permit Limit: 0.03 milligrams per dry standard
cubic meter

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 1-41: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.343(b)(1), Subpart N

Item 1-41.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Process: 05A

Emission Source: RDCHR

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

An owner or operator of an affected source subject to the requirements of this subpart is required to conduct an initial performance test as required under 40CFR63.7, using the procedures and test methods listed in 40CFR63.7 and 40CFR63.344.

Quebecor completed the performance test for the chromium electroplating tank on May 25, 1997 and July 17, 1997. The test results demonstrated compliance with total chromium emissions of 0.019 mg/dscm. The maximum surface tension measurement established during the performance test was 32 dynes/cm.

Parameter Monitored: CHROMIUM

Upper Permit Limit: 0.03 milligrams per dry standard cubic meter

Reference Test Method: EPA method 306

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-42: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.343(c)(5), Subpart N

Item 1-42.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: RDCHR

Regulated Contaminant(s):

CAS No: 007440-47-3 CHROMIUM

Item 1-42.2:

Compliance Certification shall include the following monitoring:



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

Monitoring Description:

During the initial performance test, the owner or operator of an affected source complying with the emission limitations in §63.342 through the use of a wetting agent in the electroplating or anodizing bath shall determine the outlet chromium concentration using the procedures in §63.344(c).

The owner or operator shall establish as the site-specific operating parameter the surface tension of the bath using Method 306B, appendix A of Part 63, setting the maximum value that corresponds to compliance with the applicable emission limitation.

In lieu of establishing the maximum surface tension during the performance test, the owner or operator may accept 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation. However, the owner or operator is exempt from conducting a performance test only if the criteria of paragraph (b)(2) of Section 63.343 are met.

On and after the date on which the initial performance test is required to be completed under §63.7, the owner or operator of an affected source shall monitor the surface tension of the electroplating or anodizing bath. Operation of the affected source at a surface tension greater than the value established during the performance test, or greater than 45 dynes/cm if the owner or operator is using this value in accordance with paragraph (c)(5)(i) of section 63.343, shall constitute noncompliance with the standards.

The surface tension shall be monitored according to the following schedule:

(A) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of Part 63.

(B) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs.

The minimum frequency of monitoring allowed by Subpart N is once every 40 hours of tank operation.

(C) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (c)(5)(ii)(B) of section 63.343.

Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures of paragraphs (c)(5)(ii) (B) and (C) of section 63.343.

Parameter Monitored: SURFACE TENSION

Upper Permit Limit: 32 dynes per centimeter

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

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

Condition 1-43: Compliance Certification

Effective between the dates of 01/26/2001 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.344(d)(1), Subpart N

Item 1-43.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Process: 05A

Emission Source: RDCHR

Regulated Contaminant(s):

CAS No: 007738-94-5

CHROMIC ACID

Item 1-43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



OPERATIONS

Monitoring Description:

During the performance test, the facility and the Department agreed to limit the number of rotogravure cylinders processed through the electroplating tank. A maximum of one (1) cylinder per hour was electroplated during the performance test. As such, the facility is limited to electroplating a maximum of one (1) rotogravure cylinder per hour. The facility is required to maintain a log book to document the date and time each cylinder is electroplated.

Work Practice Type: PROCESS MATERIAL THRUPUT

Upper Permit Limit: 1 items

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 116: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 212.10(c)(1)

Item 116.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0006

Process: 06A

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 116.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Quebecor has demonstrated a RACT non-applicability for the process which involves melting of glue beads and application of the melted glue to the book binders. The glue contains 0.02 percent of volatile organic compounds. The nine glue machines are each vented to separate emission points. The emission rate for each machine is determined based on the total pounds of glue used in each glue machine, multiplied by 0.0002, and divided by the

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



total hours of operation for each machine. The actual emission rate of each emission point was demonstrated to be less than 3 pounds per hour. Quebecor will reevaluate the RACT applicability if a new glue formulation with a greater VOC content is used.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3 pounds per hour

Monitoring Frequency: AS REQUIRED - SEE MONITORING

DESCRIPTION

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 117: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 228.5

Item 117.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0006

Process: 06B

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 117.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Quebecor has not used the staining process since the year 1996; however, Quebecor has requested permit flexibility to be allowed to use the stain during the permit period.

As such, the Department will require Quebecor to submit the required documentation, at least 10 days prior to using the stain, to demonstrate compliance.

Compliance with the maximum allowable 2.9 pounds of volatile organic compounds per gallon of stain will be demonstrated through either certification from the supplier/manufacturer of the stain or sample analysis of the VOC content. Quebecor is not required to demonstrate compliance using both methods.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Quebecor does not alter the stain and uses it directly as purchased by the manufacture. As such, the as-applied formulations for the stain are the same as the purchased material. Quebecor may rely on formulation data provided by the manufacturer of the material on a Certified Product Data Sheet (CPDS) or similar to demonstrate compliance with the VOC per gallon of coating limit. The manufacturer must analyze the stain using Method 24 of 40 CFR 60, Appendix A, for determining the volatile content, water content, density, volume of solids and/or weight of solids to obtain the pounds of VOC per gallon of coating, minus water and excluded VOC. If these values cannot be determined by using Method 24, Quebecor shall submit an alternative technique for determining these values for approval by the Department. These records must be maintained at the facility for five years and upon request, be submitted to the department.

Alternatively, Quebecor may complete their own analysis of the stain to demonstrate compliance with the allowable VOC per gallon of coating requirement. The department will require Quebecor to complete an initial analysis of the stain within one year of issuance of the Title V permit. The stain must be analyzed using Method 24 of 40 CFR 60, Appendix A, for determining the volatile content, water content, density, volume of solids and/or weight of solids to obtain the pounds of VOC per gallon of coating, minus water and excluded VOC. If these values cannot be determined by using Method 24, Quebecor shall submit an alternative technique for determining these values for approval by the Department. Following the initial analysis, the stain will be analyzed when the formulation is changed or once every five years upon permit renewal, whichever is sooner. These records must be maintained at the facility for five years and upon request, be submitted to the department.

Representatives of the Department shall be permitted, during reasonable business hours, to obtain samples of the stain for the purpose of determining compliance.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 118: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 228.7

Item 118.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0006

Process: 06B

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 118.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The stain used for staining the edge of the paper back
books may contain a maximum of 2.9 pounds of volatile
organic compounds (VOC) per gallon of coating, minus water
and excluded VOC, as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 119: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 234.3(a)(1)

Item 119.1:

The Compliance Certification activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Emission Unit: E-G0008

Process: 08A

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 119.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The flexographic printing presses use an ink containing volatile organic compounds. Quebecor shall not operate, cause, allow or permit the operation of these presses unless the volatile fraction of ink, as it is applied to the substrate, contains 25.0 percent by volume or less of volatile organic compounds and 75.0 percent by volume or more of nonreactive volatiles.

Emission unit EG0008, Process 08A includes eight flexographic printing presses which use a cold-set, isoparaphinic (wax), solvent-based ink. Much like newspaper printing, the isoparaphinic ink is designed to dry by adsorption of the oils into the paper substrate. The USEPA has allowed the newsprint industry to use a 95% VOC retention factor into the newspaper when estimating emissions. Based on the Department's discussions with the USEPA, it was concluded the 95% retention factor also applies when estimating emissions from the subject source. As such, the volatile fraction of the ink, as it is applied to the substrate, shall be determined by using the equation specified in 6NYCRR Part 234.3(a)(1) and then multiplied by 0.05 to account for the 95% VOC retained by the substrate.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INK

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 25 percent by volume

Reference Test Method: Method 24

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Condition 120: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 234.4

Item 120.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0008

Process: 08A

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 120.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Compliance with the flexographic printing ink to contain 25.0 percent by volume or less of volatile organic compounds and 75.0 percent by volume or more of nonreactive volatiles will be demonstrated through sample test data, required calculations, and manufacturer certifications.

Quebecor generally has a specific ink formulation for the flexographic presses. The formulation typically does not change. As such, Quebecor will complete an initial analysis of the as-applied, flexographic ink. The initial analysis will be completed within one year upon issuance of the permit. Following the initial analysis, the ink will be analyzed when the formulation is changed or once every five years upon permit renewal, whichever is sooner. The results of the analysis will be used to calculate the actual "volume fraction volatile organic compounds of ink" value using the equation in 6NYCRR Part 234.3(a)(1)(i) and then multiplying the value by 0.05 to account for the 95% VOC retained by the substrate. In addition, the results of the analysis will be used to calculate the "maximum volume fraction of volatile organic compounds in a complying ink" value using the equation in 6NYCRR Part 234.3(a)(1)(ii). The two values must be compared. Compliance is demonstrated when the "volume fraction VOC in the actual ink" is less than the "maximum volume fraction VOC in the complying ink".



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

In order to demonstrate continued compliance with the maximum percent by volume of VOC in the ink, Quebecor will maintain Material Safety Data Sheets or other similar certification from the manufacturer of the ink to document the volume fraction VOC of ink. Records must be maintained at the facility for five years.

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of printing inks are presented in Appendix A, Methods 24 and 24A respectively, of 40CFR60. Alternate analytical methods for printing ink analysis must be approved by the commissioner and the USEPA.

The results of any analysis or other procedure used for establishing compliance with this Part must be provided to the department's representative. Representatives of the Department of Environmental Conservation shall be permitted, during reasonable business hours, to obtain ink samples for the purpose of determining compliance with this Part.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INK

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 25 percent by volume

Reference Test Method: Method 24

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 121: Sources excluded from the emission control requirements
Effective between the dates of 02/08/2000 and 02/08/2005**

Applicable Federal Requirement: 40CFR 63.821(b), Subpart KK

Item 121.1:

This Condition applies to Emission Unit: E-G0008
Process: 08A

Item 121.2:

Each product and packaging rotogravure or wide-web flexographic printing affected source at a facility that is a major source of HAP, as defined in 40CFR63.2, that complies with the criteria described below on and after the applicable compliance date specified in 40CFR63.826, is subject only to requirements of



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

section 63.829(e) and section 63.830(b)(1) of Subpart KK:

The owner or operator of the source applies no more than 500 kilograms per month, for every month, of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials on product and packaging rotogravure or wide-web flexographic presses, or

The owner or operator of the source applies no more than 400 kilograms per month, for every month, of organic HAP on product and packaging rotogravure or wide-web flexographic printing presses.

Condition 122: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 40CFR 63.829(e), Subpart KK

Item 122.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0008

Process: 08A

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 122.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Quebecor has chosen to comply with the following stated criteria for each wide-web flexographic press and, thus, is only subject to the requirements of Section 63.829(e) and Section 63.830(b)(1) of Subpart KK. If any wide-web flexographic press does not comply with the following criteria for any month, it will immediately be subject to all relevant requirements of Subpart KK and is no longer eligible to use the exempt provision even if in subsequent months the affected source does comply with the following criteria:

- (1) No more than 500 kilograms per month of ink are used on any wide-web flexographic press, or
- (2) No more than 400 kilograms of organic HAP per month are used on any wide-web flexographic press.

Quebecor must maintain the following records to

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



demonstrate compliance with the above criteria:

(1) To demonstrate compliance with the 500 kilogram per month of ink usage, the total monthly volume of ink applied on each flexographic press must be maintained, or

(2) To demonstrate compliance with the 400 kilograms of organic HAP per month usage, the total monthly volume of ink usage and the organic HAP content of the ink must be maintained for each wide-web flexographic press. A Certified Product Data Sheet (CPDS) from the ink supplier or manufacturer may be used to determine the organic HAP content of the ink. A CPDS will be required for each separate ink formulation.

These records shall be maintained for five years, and upon request be submitted to the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INK

Parameter Monitored: ORGANIC HAP CONTENT

Upper Permit Limit: 400 kilograms per month

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH TOTAL

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 123: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 228.5

Item 123.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0009

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 123.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Compliance with the maximum allowable 2.9 pounds of volatile organic compounds per gallon of ink will be

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



demonstrated through either certification from the supplier/manufacturer of the ink or analysis of the ink VOC content. Quebecor is not required to demonstrate compliance using both methods.

Quebecor does not alter the ink and uses it directly as purchased by the manufacture. As such, the as-applied formulations for the ink are the same as the purchased material. Quebecor may rely on formulation data provided by the manufacturer of the material on a Certified Product Data Sheet (CPDS) or similar to demonstrate compliance with the VOC per gallon of ink limit. The manufacturer must analyze the ink using Method 24 of 40 CFR 60, Appendix A, for determining the volatile content, water content, density, volume of solids and/or weight of solids to obtain the pounds of VOC per gallon of coating, minus water and excluded VOC. If these values cannot be determined by using Method 24, Quebecor shall submit an alternative technique for determining these values for approval by the Department. These records must be maintained at the facility for five years and upon request, be submitted to the department.

Alternatively, Quebecor may complete their own analysis of the ink to demonstrate compliance with the allowable VOC per gallon of coating requirement. The department will require Quebecor to complete an initial analysis of the ink within one year of issuance of the Title V permit. The ink must be analyzed using Method 24 of 40 CFR 60, Appendix A, for determining the volatile content, water content, density, volume of solids and/or weight of solids to obtain the pounds of VOC per gallon of coating, minus water and excluded VOC. If these values cannot be determined by using Method 24, Quebecor shall submit an alternative technique for determining these values for approval by the Department. Following the initial analysis, the ink will be analyzed when the formulation is changed or once every five years upon permit renewal, whichever is sooner. These records must be maintained at the facility for five years and upon request, be submitted to the department.

Representatives of the Department shall be permitted, during reasonable business hours, to obtain samples of the ink for the purpose of determining compliance.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: AS REQUIRED - SEE MONITORING

DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY

TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 124: Compliance Certification

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable Federal Requirement: 6NYCRR 228.7

Item 124.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0009

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 124.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The ink used for ink-jet printing on cardboard boxes may contain a maximum of 2.9 pounds of volatile organic compounds (VOC) per gallon of ink, minus water and excluded VOC, as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY

TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable and are not subject to annual compliance certification requirements for Title V permits.

Condition 125: General Provisions
Effective between the dates of 02/08/2000 and 02/08/2005

Applicable State Requirement: 6NYCRR 201-5

Item 125.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Item 125.2:

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.

Item 125.3:

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.

Condition 126: Contaminant List

Effective between the dates of 02/08/2000 and 02/08/2005

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

Item 126.1:

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

CAS No: 007738-94-5
Name: CHROMIC ACID

CAS No: 007440-47-3
Name: CHROMIUM

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

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

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

Condition 127: Air pollution prohibited

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable State Requirement: 6NYCRR 211.2

Item 127.1:

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



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

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 130: Compliance Demonstration

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable State Requirement: 6NYCRR 225-1.2(a)(2)

Item 130.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 130.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person will sell, offer for sale, purchase or use any residual oil fuel which contains sulfur in a quantity exceeding the following limitation.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RESIDUAL FUEL (#4, #5 AND/OR #6 FUEL OIL)

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 131: Compliance Demonstration

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable State Requirement: 6NYCRR 211.2

Item 131.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-G0001

Process: 01A

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213



Item 131.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission unit EG0001, Process 01A, includes three large cyclones for handling trimmed paper waste from the printing and publishing operations at this facility. The cyclones are located on the roof of the main building and discharge to the outside atmosphere. The cyclones have demonstrated compliance with the grain loading requirements of Part 212. However, due to the large volume of air and paper waste handled by these sources, some material does escape the system. Historically, there has been a continuous accumulation of particulate fall-out from the cyclones to the outside atmosphere. The fall-out is large in size and, thus, it does not travel far.

Typically, the paper waste collects on the roof and immediately surrounding the main building. As such, the fall-out has predominately been an on-site nuisance, however, some off-site impacts have occurred. Due to the large potential impact from these sources, the Department has requested the facility to complete an investigation of reducing the fall-out from these sources. The Department has also requested the option of venting the sources back into the building be evaluated. The Department believes there could be a great energy cost savings when the 100,000 cfm of air is vented back into the building by possibly reducing heating and/or air-conditioning costs. The report of the results from the investigation should be submitted to the Department within one year of issuance of this permit.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 133: Compliance Demonstration

Effective between the dates of 02/08/2000 and 02/08/2005

Applicable State Requirement: 6NYCRR 212.4(b)

Item 133.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: E-G0005

Process: 05A



New York State Department of Environmental Conservation

Permit ID: 9-1430-00213/00110

Facility DEC ID: 9143000213

Regulated Contaminant(s):

CAS No: 007738-94-5 CHROMIC ACID

Item 133.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Chromic acid is given an environmental rating of A. The emission rate potential of chromic acid from the electroplating process is less than 1.0 pound per hour. In accordance with 6NYCRR Part 212.4(b), the degree of air cleaning required for these stated emissions shall be specified by the Department. As such, the Department considers demonstration of compliance with 40CFR63 Subpart N, the "National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Anodizing Tanks", as satisfying the emission requirements of Part 212.4.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY