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
Effective Date: 08/30/2007 Expiration Date: 08/29/2012

Permit Issued To: QUEBECOR WORLD BUFFALO INC
2475 GEORGE URBAN BLVD
DEPEW, NY 14043-2019

Contact: ROBERT J SCHEIFFLEE
QUEBECOR PRINTING BUFFALO INC
2475 GEORGE URBAN BLVD
DEPEW, NY 14043
(716) 686-2730

Facility: QUEBECOR WORLD BUFFALO INC
2475 GEORGE URBAN BLVD
DEPEW, NY 14043-2098

Contact: JANET E SCHMIDT
QUEBECOR WORLD BUFFALO INC
2475 GEORGE URBAN BLVD
DEPEW, NY 14043-2098
(716) 686-2500

Description:
Quebecor World Buffalo, Inc. is a commercial printing facility situated on 69 acres of property in the Village of Depew, Erie County, New York. The main building for the facility has approximately 850,000 square feet of floor space which houses six rotogravure presses, eitght offset presses, and six flexographic presses. Other operations used to support the printed product include prepress imaging, cylinder engraving, perfect binding lines, and saddle stitched binding lines. The SIC code for this facility is 2754 - Commercial Printing, Gravure.

The facility potential emissions of sulfur dioxide, oxides of nitrogen, volatile organic compounds, toluene, and xylene exceed the major source thresholds for Title V applicability. As such, the facility is subject to the permitting requirements stated in 6 NYCRR Part 201-6. The printing operations are subject to the Reasonably Available Control Technology (RACT) provisions of 6NYCRR Part 234 and the Maximum Achievable Control Technology (MACT) requirements of 40 CFR63 Subpart KK. One of the rotogravure printing presses must comply with the New Source Performance Standards (NSPS) specified in 40CFR60 Subpart QQ. Other operations at the facility associated with the printing production include a hard chromium electroplating process which is applicable to the MACT standard specified in 40CFR63 Subpart N and surface coating operations subject to the RACT requirements of 6NYCRR Part 228.

The Title V permit includes nine emission units identified as E-G0001 through E-G0009. A brief description of each emission unit and the associated processes are provided below:

E-G0001 includes eight book bindery trimmers and three inserter trimmers which produce paper trimmings sent for recycling. Four cyclones, used to control emissions of particulate matter, exhaust to five baghouses which discharge air back into the main building;

E-G0002 includes seven offset, cold set lithographic printing presses and one offset heatset press. The eight six presses control VOC emissions through the VOC content of the fountain solution. In addition, Press 200 of process 02B uses a catalytic afterburner to control odors and opacity. Ink emissions from non-heatset operations are controlled by low vapor pressure ink oils. 95% of the ink oil applied to the web substrate stays in the web permanently. Ink emissions from heatset are also controlled by low vapor pressure ink oils. None of the ink oils emit ahead of the dryer. After passing through the dryer, 20% remain with the web and the balance are routed to a catalytic afterburner where 95% of them are destroyed;

E-G0003 includes three dual fuel package boilers each with a maximum heat input capacity of 25 mmBtu/hr. The boilers were constructed prior to June 9, 1989 and, thus, are not subject to 40CFR60 Subpart Dc. The boilers are capable of burning no. 4, 5, or 6 fuel oil or natural gas. . The sources comply with the annual tune-up requirement to satisfy NOx RACT. All three of the boilers are subject to the initial notification requirements of 40CFR63 Subpart DDDDD;

E-G0004 includes six rotogravure printing presses. The VOC emissions from all presses are controlled by a solvent recovery system. In addition, the HAP emissions from all presses are subject to 40CFR63 Subpart KK;

E-G0005 includes two hard chromium electroplating tanks. Chromium emissions are subject to 40CFR63 Subpart N. The facility uses a fume suppressant and add-on control devices to control chromium emissions from the tanks;

E-G0006 includes eight book binders. Process 06A includes the process of melting and applying glue to the books. Process 06B includes the staining of the book edges. The VOC emissions from these sources are controlled by limiting the volatile fraction of the glue and stain;

E-G0007 includes three horizontal carbon steel tanks each with a capacity of 10,000 gallons. The tanks are exempt from 6NYCRR Part 229 because they are horizontal. In addition, the tanks do not qualify for 40CFR60 Subpart Kb due to the size being less than 40 cubic meters. This emission unit has no associated conditions in the Title V permit;

E-G0008 includes six flexographic presses. VOC emissions are controlled by limiting the volatile fraction of the ink; and

E-G0009 includes nine ink jet printing operations. VOC emissions are controlled by limiting the volatile fraction of the ink.

New York State Department of Environmental Conservation
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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: DAVID S DENK
DIVISION OF ENVIRONMENTAL PERMITS
270 MICHIGAN AVE
BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ___ / ___ / _____

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

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

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

LIST OF CONDITIONS

DEC GENERAL CONDITIONS
General Provisions
Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and Determinations
Applications for permit renewals, modifications and transfers
Applications for Permit Renewals and Modifications
Permit modifications, suspensions or revocations by the Department
Permit Modifications, Suspensions and Revocations by the Department
Facility Level
Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

DEC GENERAL CONDITIONS
****** General Provisions ******
For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

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

Item 1.1:
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

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

Item 2.1:
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

Item 3.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:
The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

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

Condition 4: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 4.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 4.2:
The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 4.3:
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 5: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 5.1:
The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

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

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

Item 6.1:
The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

a) materially false or inaccurate statements in the permit application or supporting papers;
b) failure by the permittee to comply with any terms or conditions of the permit;

c) exceeding the scope of the project as described in the permit application;
d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

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

Condition 7: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)

Item 7.1:
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

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2475 GEORGE URBAN BLVD
DEPEW, NY 14043-2019

Facility: QUEBECOR WORLD BUFFALO INC
2475 GEORGE URBAN BLVD
DEPEW, NY 14043-2098

Authorized Activity By Standard Industrial Classification Code:
2754 - COMMERCIAL PRINTING, GRAVURE
2759 - COMMERCIAL PRINTING, NEC
9999 - NONCLASSIFIABLE ESTABLISHMENTS

Permit Effective Date: 08/30/2007 Permit Expiration Date: 08/29/2012

LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

1 6NYCRR 200.6: Acceptable Ambient Air Quality
2 6NYCRR 201-6.5(a)(7): Fees
3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
6 6NYCRR 201-6.5(e): Compliance Certification
7 6NYCRR 202-2.1: Compliance Certification
8 6NYCRR 202-2.5: Recordkeeping requirements
9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
10 6NYCRR 200.7: Maintenance of Equipment
11 6NYCRR 201-1.7: Recycling and Salvage
12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
14 6NYCRR 201-3.2(a): Compliance Certification
15 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
16 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
17 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
18 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
19 6NYCRR 201-6.5(f)(6): Off Permit Changes
20 6NYCRR 202-1.1: Required Emissions Tests
21 6NYCRR 211.3: Visible Emissions Limited
22 40CFR 68: Accidental release provisions.
23 40CFR 82, Subpart F: Recycling and Emissions Reduction
24 6NYCRR 200.3: False statement
25 6NYCRR 201-6: Emission Unit Definition
26 6NYCRR 212.6(a): Compliance Certification
27 6NYCRR 234.1(g): Compliance Certification
28 6NYCRR 234.3(e): Compliance Certification
29 6NYCRR 234.6: Handling, storage, and disposal of volatile organic compounds
30 40CFR 60.4, NSPS Subpart A: EPA Region 2 address.
31 40CFR 60.434(a), NSPS Subpart QQ: Compliance Certification
32 40CFR 63.6(e)(3), Subpart A: Compliance Certification

Emission Unit Level

33 6NYCRR 201-6: Emission Point Definition By Emission Unit
34 6NYCRR 201-6: Process Definition By Emission Unit

EU=E-G0002,Proc=02A

35 6NYCRR 234.3(b)(2): Compliance Certification

EU=E-G0002,Proc=02B
36 6NYCRR 234.3(b)(1): Compliance Certification

EU=E-G0002,Proc=02B,ES=EQ200
37 6NYCRR 234.4(c)(2): Compliance Certification

EU=E-G0003
38 6NYCRR 225-1.2(a)(2): Compliance Certification
39 6NYCRR 225-1.8(a): Compliance Certification
40 6NYCRR 227-1.3(a): Compliance Certification
41 6NYCRR 227-2.4(d): Compliance Certification
42 40CFR 63.7506(b), Subpart DDDDD: Compliance Certification

EU=E-G0004
43 6NYCRR 234.4(c)(3): Compliance Certification
44 40CFR 60.7(b), NSPS Subpart A: Recordkeeping requirements.
45 40CFR 60.11(d), NSPS Subpart A: Compliance with Standards and Maintenance Requirements
46 40CFR 60.435, NSPS Subpart QQ: Compliance Certification
47 40CFR 63.823, Subpart KK: Part 63 General Provisions requirements
48 40CFR 63.824(b)(1)(i), Subpart KK: Compliance Certification
49 40CFR 63.827(a)(3), Subpart KK: Exemption from performance test for solvent recovery devices
50 40CFR 63.827(b)(1), Subpart KK: Compliance Certification
51 40CFR 63.829(b), Subpart KK: Compliance Certification
52 40CFR 63.829(c), Subpart KK: Compliance Certification
53 40CFR 63.830(b)(5), Subpart KK: Compliance Certification

EU=E-G0004,Proc=04A,ES=EQ210
54 6NYCRR 234.3(a)(3)(i): Compliance Certification

EU=E-G0005
55 6NYCRR 212.4(b): Compliance Certification
56 40CFR 63.340(b), Subpart N: Part 63 General Provisions requirements
57 40CFR 63.342(b)(1), Subpart N: Standards apply during all tank operation
58 40CFR 63.342(c)(3), Subpart N: Compliance Certification
59 40CFR 63.342(f), Subpart N: Compliance Certification
60 40CFR 63.343(c)(5), Subpart N: Compliance Certification
61 40CFR 63.344(d)(1), Subpart N: Compliance Certification
62 40CFR 63.346(b), Subpart N: Compliance Certification
63 40CFR 63.347(g)(1), Subpart N: Compliance Certification

EU=E-G0005,Proc=05A,ES=CHR03
64 40CFR 63.343(c)(1), Subpart N: Compliance Certification

EU=E-G0005,Proc=05A,ES=CHR04

65 40CFR 63.343(c)(1), Subpart N: Compliance Certification

EU=E-G0006,Proc=06A
66 6NYCRR 212.10(c)(1): Compliance Certification

EU=E-G0006,Proc=06B
68 6NYCRR 228.7: Compliance Certification
67 6NYCRR 228.10: Compliance Certification

EU=E-G0008
69 6NYCRR 234.3(a)(1): Compliance Certification
70 40CFR 63.821(b)(2), Subpart KK: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS
Facility Level
71 ECL 19-0301: Contaminant List
72 6NYCRR 201-1.4: Unavoidable noncompliance and violations
73 6NYCRR 211.2: Air pollution prohibited

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

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

Item A: Emergency Defense - 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 emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item B: Public Access to Recordkeeping for Title V Facilities - 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 C: **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 D: **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 E: **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 F: **Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission 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 G: **Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR 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 H: 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 I: 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 J: 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

Act;

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

Item K: Reopening for Cause - 6 NYCRR 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 a shorter time period in the case of an emergency.

Item L: **Permit Exclusion - ECL 19-0305**
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: **Federally Enforceable Requirements - 40 CFR 70.6(b)**
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: **Acceptable Ambient Air Quality**
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit

any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 2.1:
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 3.1:
The following information must be included in any required compliance monitoring records and reports:

(i) The date, place, and time of sampling or measurements;

(ii) The date(s) analyses were performed;

(iii)The company or entity that performed the analyses;

(iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;

(v) The results of such analyses including quality assurance data where required; and

(vi) The operating conditions as existing at the time of sampling or measurement.

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

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 4.1:
Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable

regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 5.1:
The Compliance Certification activity will be performed for the Facility.

Item 5.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
To meet the requirements of this facility permit with respect to reporting, the permittee must:

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

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

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

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

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 6.1:
The Compliance Certification activity will be performed for the Facility.

Item 6.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Requirements for compliance certifications with terms and conditions contained in this facility permit include the

following:

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

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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

USEPA Region 2

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 BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:
(a) The following records shall be maintained for at least five years:

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

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

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

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:
No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:
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 11: Recycling and Salvage
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:
Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 12.1:
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 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 13.1:
The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 14: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 14.1:
The Compliance Certification activity will be performed for the Facility.

Item 14.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
As proof of exempt eligibility for the emergency generators, the facility must maintain monthly records which demonstrate that each engine is operated less than 500 hours per year, on a 12-month rolling total basis.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MINIMUM ROLLED MONTHLY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Trivial Sources - Proof of Eligibility
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 15.1:
The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 16: Standard Requirement - Provide Information
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 16.1:
The owner and/or operator 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. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 17: General Condition - Right to Inspect
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 17.1:
The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart 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 emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 18: Standard Requirements - Progress Reports
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 18.1:
Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. 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 19: Off Permit Changes
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 19.1:
No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 20: Required Emissions Tests
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 20.1:
For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 21: Visible Emissions Limited
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 211.3

Item 21.1:
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 22: Accidental release provisions.
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 40CFR 68

Item 22.1:
If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center

C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 23: Recycling and Emissions Reduction
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 23.1:
The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 24: False statement
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 200.3

Item 24.1:
No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 25: Emission Unit Definition
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 25.1:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: E-G0001
Emission Unit Description:
Emission unit E-G0001 consists of eight book bindery trimmers identified as TR401, TR411, TR421, TR431, TR441, TR461, TR471, and TR481; and three inserter trimmers identified as TR332, TR334, and TR338. Each trimmer has pickup points ducted to one of four cyclones located on the roof of the main building. The cyclones are identified as 00CCY, 00NCY, 00SCY, and 00WCY. This emission unit also includes a hogger which has a stand alone cyclone/baler, identified as HOGCY, for paper waste fed into a hopper at the hogger. The exhaust from the

cyclones vents to one of five baghouses that discharge air back into the main building. The baghouses are identified as NWBH, SCBH, HOGBH, DUST1, and DUST2. 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.

Building(s): MAIN

Item 25.2:
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 seven (7) offset, coldset lithographic printing presses and one (1) offset, heatset press. 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.

Building(s): MAIN

Item 25.3:
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) and natural gas. The boilers are used to provide the gravure printing process with steam for ink drying and room/web humidification, and for building heat.
Condensate water decanted from the solvent recovery system is used in the boilers for steam generation.
Emission sources EQ064 and EQ065 were constructed in 1961 and emission source EQ065 was constructed in 1979, which is prior to the applicability date of 40CFR60 Subpart Dc.

All three of the boilers are subject to the initial notification requirements of 40CFR63 Subpart DDDDD.

Building(s): BOILER

Item 25.4:
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. The three systems each interact together and are viewed as a single total system.

Building(s): MAIN

Item 25.5:
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 two hard chromium electroplating tanks with a maximum cumulative potential rectifier capacity of greater than 60 million amp-hr per year. Quebecor has limited the rectifier capacity to below 60 million amp-hr/yr, pursuant to 40CFR63.342(c)(2)(i). The chrome plating bath utilizes a fume suppressant to reduce misting. A plate and baffle mist eliminator is used in the exhaust stream. A mesh pad filter removes particles from the exhaust stream and is the primary compliance indicator for the emission unit.

Building(s): MAIN

Item 25.6:
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 eight (8) book binders with hot melt glue pots for attaching the covers to paperback books. Binders EQ430 and EQ460 have open glue pots with stack emissions. Binders EQ400, EQ420, EQ410, EQ440, EQ470, and EQ480 have closed glue pots with no stack emissions. A stain booth, identified as EQ481, applies yellow stain to book edges. Binders 430, 440, and 470 are associated with the stain booth.

Building(s): MAIN

Item 25.7:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: E-G0007
Emission Unit Description:
Emission unit E-G0007 consists of three horizontal carbon steel solvent tanks, each with a maximum capacity of 9908 gallons. The material contained in the tanks is recovered solvent from the solvent recovery system. There is also one 9908 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. The four 9908 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). The tanks are not subject to 40CFR60 Subpart Kb since the capacity is less than 40 cubic meters. This emission unit has no associated conditions in the permit.

Building(s): MAIN

Item 25.8:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: E-G0008
Emission Unit Description:
Emission unit E-G0008 includes six (6) 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.

Building(s): MAIN

Item 25.9:
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 cardboard boxes. There are no associated emission points with these sources.

Building(s): MAIN

Condition 26: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 26.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: E-G0001

Emission Unit: E-G0005

Emission Unit: E-G0006

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

Item 26.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any emission source, except only the emission of uncombined water. The Department reserves

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

The permittee will conduct observations of visible emissions from the facility on a daily basis. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with 6NYCRR Part 212.6(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: DAILY
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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 234.1(g)

Item 27.1:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 27.2:
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 PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 28: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 28.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: E-G0002

Emission Unit: E-G0004

Emission Unit: E-G0008

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

Item 28.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 10 percent or greater from any emission source subject to 6NYCRR Part 234, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the facility on a daily basis. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred.

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

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 10 percent
Monitoring Frequency: DAILY
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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 29: Handling, storage, and disposal of volatile organic compounds
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 234.6

Item 29.1:
No owner or operator of a facility subject to 6NYCRR Part 234 shall:

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

(b) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;

(c) use open containers to store or dispose of inks and/or surface coatings; or

(d) use open containers to store or dispense inks and/or surface coatings unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

Condition 30: EPA Region 2 address.
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 40CFR 60.4, NSPS Subpart A

Item 30.1:
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 Quality Assurance
625 Broadway
Albany, NY 12233-3258

Condition 31: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 31.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: E-G0004
Process: 04A Emission Source: EQ211

Emission Unit: E-G0004

Process: 04A Emission Source: EQ212

Emission Unit: E-G0004
Process: 04A Emission Source: EQ214

Emission Unit: E-G0004
Process: 04A Emission Source: EQ217

Emission Unit: E-G0004
Process: 04A Emission Source: EQ218

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

Item 31.2:
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. Quebecor has accepted a greater control efficiency of 84% for the existing facilities, as opposed to the 75% control efficiency required by 6NYCRR Part 234.

The solvent recovery system provides for an overall reduction in volatile organic compound (VOC) emissions of at least 84%. 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. The liquid-to-liquid material balance is calculated on a facility-wide basis. The information from the internal reports are used to prepare a monthly summary report. Quebecor must complete a monthly summary report to demonstrate continued compliance with the regulations.

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.

Records of the amount of solvent used, solvent recovered, and estimated solvent recovery percentage shall be maintained on-site for a period of 2 years and be made available for review upon request by the Department.

Parameter Monitored: SOLVENT RECOVERY RATE
Lower Permit Limit: 84 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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 32.1:
The Compliance Certification activity will be performed for the Facility.

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

Item 32.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
As required by 40CFR63.6(e)(3), Quebecor developed and implemented a written Startup, Shutdown, and Malfunction Plan, dated May 30, 1999, for operating and maintaining the source during periods of startup, shutdown, and malfunction. The Plan includes corrective action for malfunctioning process and/or air pollution control equipment. This Plan was submitted with the original Title V permit application and is made part of this permit by reference.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

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

Condition 33: Emission Point Definition By Emission Unit
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 33.1:
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

Item 33.2:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: E-G0002

Emission Point: 00078
Height (ft.): 48 Length (in.): 18 Width (in.): 18
NYTMN (km.): 4758.32 NYTME (km.): 196.429 Building: MAIN

Item 33.3:
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 33.4:
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
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

Emission Point: 0075D
Height (ft.): 24 Diameter (in.): 30

Emission Point: 0075E
Height (ft.): 24 Diameter (in.): 30

Item 33.5:
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 33.6:
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: 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

Condition 34: Process Definition By Emission Unit
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 34.1:
This permit authorizes the following regulated processes for the cited Emission Unit:

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 passed through cyclones and then ducted to baghouses which vent back into the main building.

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

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

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

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

Emission Source/Control: 0NWBH - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 0SCBH - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: DUST1 - Control
Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: DUST2 - 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: TR332 - Process

Emission Source/Control: TR334 - Process

Emission Source/Control: TR338 - Process

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: TR461 - Process

Emission Source/Control: TR471 - Process

Emission Source/Control: TR481 - Process

Item 34.2:
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 seven 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 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 EQ101 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 EQ104 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 EQ 126 is a two-unit, one color, non-heat set, web offset press. This press has no direct emission points to the outside atmosphere.

(7) Press EQ 127 is a two-unit, one color, non-heat set, web offset press. This press has no direct emission points to the outside atmosphere.

Emission Source/Control: EQ033 - Process

Emission Source/Control: EQ038 - Process

Emission Source/Control: EQ101 - Process

Emission Source/Control: EQ104 - Process

Emission Source/Control: EQ125 - Process

Emission Source/Control: EQ126 - Process

Emission Source/Control: EQ127 - Process

Item 34.3:
This permit authorizes the following regulated processes for the cited Emission Unit:

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 200 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 VOC emissions from Press 200 are controlled 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 34.4:
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

Item 34.5:
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 34.6:
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. Press 214 was constructed after October 28, 1980 and is subject to 40CFR60 Subpart QQ. The remaining five presses were each constructed prior to October 28, 1980 and are not subject to 40CFR60 Subpart QQ but are subject to a less stringent regulation, 6NYCRR Part 234. Due to the interconnected operation of the six presses and the three solvent recovery systems, Quebecor has chosen to have all six presses subject to 40CFR60 Subpart QQ, superseding the requirements of 6NYCRR Part 234.

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: EQ217 - Process

Emission Source/Control: EQ218 - Process

Item 34.7:
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. A plate and baffle mist eliminator is used in the exhaust stream. A mesh pad

filter removes particles from the exhaust stream and is the primary compliance indicator for the emission unit.

Emission Source/Control: CTR3A - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: CTR3B - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: CTR4A - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: CTR4B - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: CHR03 - Process

Emission Source/Control: CHR04 - Process

Item 34.8:
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: EQ420 - Process

Emission Source/Control: EQ430 - Process

Emission Source/Control: EQ440 - Process

Emission Source/Control: EQ460 - Process

Emission Source/Control: EQ470 - Process

Emission Source/Control: EQ480 - Process

Item 34.9:
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 stain to book edges using a staining booth.

Emission Source/Control: EQ430 - Process

Emission Source/Control: EQ440 - Process

Emission Source/Control: EQ470 - Process

Emission Source/Control: EQ481 - Process

Item 34.10:
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 34.11:
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.

Emission Source/Control: EQ112 - Process

Emission Source/Control: EQ114 - Process

Emission Source/Control: EQ116 - Process

Emission Source/Control: EQ117 - Process

Emission Source/Control: EQ118 - Process

Emission Source/Control: EQ119 - Process

Item 34.12:
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 and books.

Emission Source/Control: EQIK9 - Process

Condition 35: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 35.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0002
Process: 02A

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

Item 35.2:
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,

EQ104, and EQ125 will be demonstrated through dilution calculation records and sample test results.

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 has a centralized fountain solution formulation which was tested to determine the VOC content in June, 2006. This formulation typically does not change. The fountain solution will be analyzed if the formulation is changed.

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.

All records are to be kept on site for a period of five years and made available to Department representatives during normal business hours. Department representatives shall be permitted, during reasonable business hours, to obtain fountain solution samples to determine compliance.

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 PERMIT 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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 36: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 36.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0002
Process: 02B

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

Item 36.2:
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 obtain a diluted solution with a VOC content less than the regulated value.

Quebecor has a centralized fountain solution formulation which was tested to determine the VOC content in June, 2006. This formulation typically does not change. The fountain solution will be analyzed if the formulation is changed.

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.

All records are to be kept on site for a period of five years and made available to Department representatives during normal business hours. Department representatives shall be permitted, during reasonable business hours, to obtain fountain solution samples to determine compliance.

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 (40CFR60)
Monitoring Frequency: AS REQUIRED - SEE PERMIT 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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 37: Compliance Certification

Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 37.1:
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 37.2:
Compliance Certification shall include the following monitoring:

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

The off-set lithographic web 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. A Regenerative Thermal Oxidizer (catalytic afterburner), identified as emission source CT078, was installed with the press as original equipment.

Quebecor will assure that the VOC-laden gas stream from an operating Press 200 will be routed to a properly operating catalytic afterburner. This is accomplished by the interlocked afterburner and press system, which only allows operation of the press if the catalyst bed temperature is at least 700 degrees F. This assures that the VOC-laden gas stream from the press in printing mode can not pass through an insufficiently warmed afterburner which would be incapable of a sufficient destruction efficiency.

Quebecor will continuously monitor the temperature of the inlet gas stream to the afterburner. The temperature will be maintained at or above 675 degrees F to assure the minimum destruction efficiency based on catalyst analyses.

Continuous monitors to measure the temperature at the inlet and outlet of the catalytic incinerator bed must be installed, periodically calibrated, and operated at all

times the associated control equipment is operating. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. The catalyst beds will be inspected for cracks, gaps, and leaks on a quarterly basis, with inspection results recorded in a log format acceptable to the Department. This log shall be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

Parameter Monitored: TEMPERATURE
Upper Permit Limit: 675 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 38: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 38.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0003

Item 38.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
No person shall use, purchase, sell, or offer for sale any residual fuel oil which has a sulfur content greater than the limit presented below. A log of the sulfur content in oil per delivery must be maintained on site for a minimum of five years after the date of the last entry.

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
Monitoring Frequency: AS REQUIRED - SEE PERMIT 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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 39: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 39.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0003

Item 39.2:
Compliance Certification shall include the following monitoring:

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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 40: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 40.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0003

Item 40.2:
Compliance Certification shall include the following monitoring:

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

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any emission source, except for one six-minute period per hour of not more than 27 percent opacity, or only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the facility on a daily basis. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with 6NYCRR Part 227.1.3(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: DAILY
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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 41.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0003

Item 41.2:
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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 42: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 40CFR 63.7506(b), Subpart DDDDD

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

Emission Unit: E-G0003

Item 42.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Quebecor's three dual-fuel boilers are capable of burning

natural gas and residual fuel oils. Each has a rated heat input capacity of 25 MMBtu/hr. The boilers identified as EQ064 and EQ065 were constructed in 1961, while emission source EQ063 was constructed in 1979. The boilers are subject to 40CFR63 Subpart DDDDD, Industrial, Commercial and Institutional Boilers, and are considered "existing large liquid fuel units". This boiler category is subject to only the initial notification requirements in 40CFR63 Subpart A, §63.9(b) and is not subject to the emission limits, operating limits, or work practice standards in 40CFR63 Subpart DDDDD. The initial notification mustbe submitted to the Administrator no later than September 13, 2007.

Monitoring Frequency: SINGLE OCCURRENCE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 43: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

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

Emission Unit: E-G0004

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

Item 43.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Quebecor utilizes three solvent recovery systems, identified as CT068, CT071, and CT075, to capture and recover VOC emissions from each of the publication rotogravure printing presses, identified as emission sources EQ210, EQ211, EQ212, EQ214, EQ217, and EQ218.

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. VOC detectors, serving as a continuous monitoring device, are operated at all times the associated solvent recovery systems are operated. Calibration of the three VOC detectors using a span gas of 100 ppm toluene is completed on a weekly basis. This information along with any variation from the setpoint before resetting is recorded in a log book, in a format acceptable to the Department, which will be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

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

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 44: Recordkeeping requirements.
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 44.1:
This Condition applies to Emission Unit: E-G0004

Item 44.2:
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 45: Compliance with Standards and Maintenance Requirements
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 45.1:
This Condition applies to Emission Unit: E-G0004

Item 45.2:
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 46: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 40CFR 60.435, NSPS Subpart QQ

Item 46.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Item 46.2:
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 below.

The owner or operator of any affected facility using solvent-borne ink systems shall:

1. Determine the VOC content of the raw inks and related coatings used at the affected facility by:

a. Analysis using Reference Method 24A of routine weekly

samples of raw ink and related coatings in each respective storage tank; or
b. Analysis using Reference Method 24A of samples of each shipment of all purchased raw inks and related coatings; or
c. Determination of the VOC content from the formulation data supplied by the ink manufacturer with each shipment of raw inks and related coatings.

2. Determine compliance when discrepancies with ink manufacturers' formulation data occur using the results of verification analysis by Reference Method 24A.

3. 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 PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 47: Part 63 General Provisions requirements
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 40CFR 63.823, Subpart KK

Item 47.1:
This Condition applies to Emission Unit: E-G0004

Item 47.2:
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 48: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 48.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 48.2:
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% of organic HAP used. Quebecor performs a liquid-to-liquid material balance for each month to demonstrate continued compliance. The overall effective organic HAP control efficiency (Re) is calculated using the following formula:

Re = (100) X (Mvu-Mhu) + ((Mvr)(Mhu/Mvu))

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.

Quebecor determines 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 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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 49: Exemption from performance test for solvent recovery devices
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 49.1:
This Condition applies to Emission Unit: E-G0004

Item 49.2: An owner or operator using a control device to comply with 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 50: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 50.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

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

Item 50.2:
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 manufacturer 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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 51.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Item 51.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Each owner or operator of an affected major source that is subject to 40CFR Part 63 Subpart KK shall maintain the following records 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.

(2) 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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 52: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 52.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

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

Item 52.2:
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 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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 53: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 53.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0004

Item 53.2:
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 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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 54: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 54.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0004
Process: 04A Emission Source: EQ210

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

Item 54.2:
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 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% where a publication rotogravure process is employed. 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, superseding the requirement for 6NYCRR Part 234.

Parameter Monitored: SOLVENT RECOVERY RATE
Lower Permit Limit: 75 percent reduction
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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 55: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 212.4(b)

Item 55.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Regulated Contaminant(s):
CAS No: 007738-94-5 CHROMIC ACID

Item 55.2:
Compliance Certification 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 chomic 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. 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 PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 56: Part 63 General Provisions requirements
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 40CFR 63.340(b), Subpart N

Item 56.1:
This Condition applies to Emission Unit: E-G0005

Item 56.2:
Owners or operators of affected sources subject to 40CFR63 Subpart N must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Table 1 of Subpart N. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring,

notification, recordkeeping, reporting, and control devices that may apply to the source.

Condition 57: Standards apply during all tank operation
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 57.1:
This Condition applies to Emission Unit: E-G0005

Item 57.2:
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 58: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 58.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

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

Item 58.2:
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 the two chromium electroplating tanks, identified as emission sources CHR03 & CHR04, is greater than 60 million ampere-hours per year which classifies Quebecor as a large electroplating facility. Quebecor has chosen to demonstrate the actual cumulative rectifier capacity is less than 60 million amp-hr/yr for the facility. This demonstration allows Quebecor to alternatively be considered a small hard chromium electroplating facility.

Quebecor is required to keep monthly records of actual ampere-hr usage for each rectifier using nonresettable ampere-hr meters on each rectifier. Quebecor is also 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, which is the limit for a large hard chromium electroplating facility. Compliance with the lower limit 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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 59: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 59.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

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

Item 59.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Quebecor is subject to the work practice standards for

the hard chromium electroplating tanks, identified as emission sources CHR03 & CHR04. In accordance with these requirements, Quebecor prepared an Operation and Maintenance Plan (Plan) for the electroplating tanks. The Plan specifies procedures for the proper operation and maintenance of the tanks, use of the fume suppressant, and operation of the mist eliminators. The Plan also includes a summary of the work practice standards to be followed for each control technique. Quebecor will evaluate the results of the work practice standard check lists to ensure that malfunctions due to poor maintenance and other preventable conditions do not occur.

At all times, including periods of startup, shutdown, and malfunction, Quebecor shall operate and maintain the electroplating tanks, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Plan. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the Plan.

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, the Administrator may require that Quebecor make changes to the Plan 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 electroplating tanks, 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 60: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 60.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

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

Item 60.2:
Compliance Certification shall include the following monitoring:

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

During the initial performance tests for the chromium electroplating tanks identified as CHR03 & CHR04 conducted on October 25 & 26, 2000, and April 4, 2002, respectively, Quebceor measured the surface tension of the chrome electroplating baths as site-specific operating parameters. The average surface tensions measured were 22.9 and 22 dynes/cm, for CHR03 & CHR04, respectively.

Quebecor has designated the composite mesh pad filters of the two electroplating tanks as the control technique to be used as the main compliance indicator. Pressure drops across each filter is monitored daily in accordance with 40CFR63.343(c)(1) and Permit Conditions #64 & 65. Monitoring of the surface tension of each tank is a secondary indicator which is not required for compliance with 40CFR63 Subpart N.

40CFR63.343(c)(5) allows for the acceptance of 35 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation in lieu of establishing the maximum surface tension during the performance test, if the criteria 40CFR63.343(b)(2) are met. Since Quebecor met those criteria and are monitoring

surface tension voluntarily on a monthly basis as an additional compliance indicator, the acceptable surface tension limit is set at 35 dynes/cm.

Parameter Monitored: SURFACE TENSION
Upper Permit Limit: 35 dynes per centimeter
Monitoring Frequency: AS REQUIRED - SEE PERMIT 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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 61: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 61.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

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

Item 61.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
During the initial performance tests for the chromium electroplating tanks identified as CHR03 & CHR04 conducted on October 25 & 26, 2000, and April 4, 2002, respectively, Quebecor chose to limit the number of rotogravure cylinders processed through the plating tanks. A maximum of two (2) cylinders per hour were electroplated during the performance tests. The facility is limited to electroplating a maximum of two (2) rotogravure cylinders per hour in each individual tank. The facility will maintain a log book to document the date and time each cylinder is electroplated in the tanks. The log book shall be maintained on-site for a period of 5 years, and be made available for review upon request by the Department.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: ITEMS
Upper Permit Limit: 2 number (or quantity) per hour
Monitoring Frequency: AS REQUIRED - SEE PERMIT 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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 62: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 62.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

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

Item 62.2:
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 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 PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 63: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 63.1:

The Compliance Certification activity will be performed for:

Emission Unit: E-G0005

Item 63.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Quebecor shall submit a summary report to the Administrator to document the ongoing compliance status of the chromium electroplating tanks. The report shall be submitted semiannually, except if:

(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 Quebecor in accordance with 40CFR63.343(c) show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once an exceedance is detected, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency per 40CFR63.347(g)(2) is approved.

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 40CFR63.343(c);
(3) The relevant emission limitation for the affected 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 40CFR63.347;
(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 40CFR63.342(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 40CFR63.342(f) were followed in accordance with the operation and maintenance plan for the source;
(10) If the operation and maintenance plan required by 40CFR63.342(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 40CFR63.342(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 PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 64: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 64.1:
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 64.2:
Compliance Certification shall include the following monitoring:

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

Quebecor completed the required performance test for the chromium electroplating tank identified as CHR03 on October 25 & October 26, 2000. The test results demonstrated compliance with the total chromium emissions limit of 0.03 mg/dscm. Continued compliance is assured via the surrogate compliance indicator described below.

CHR03 is equipped with multiple control devices. A fume suppressant is followed by a plate and baffle scrubber which catches droplets of chromium mist. A composite mesh pad filter removes particles within the exhaust stream. The mesh pad is considered the main compliance indicator for the electroplating tanks. A magnehelic gauge measures the pressure drop across the mesh pad filter.

During the performance test conducted on October 25 & 26, 2000, the pressure drop across the mesh pad filter as measured by the magnehelic gauge was 0.5 inches of water column. Quebecor must record the pressure drop readings a minimum of one time during each day of operation. The compliant range for pressure drop readings is no more than +/- 2 inches of water column from the performance test values.

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. Quebecor must ensure that appropriate maintenance procedures are followed so that the mesh pad filter performs effectively.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: 0 inches of water
Upper Permit Limit: 2.5 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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 65: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 65.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0005
Process: 05A Emission Source: CHR04

Regulated Contaminant(s):
CAS No: 007738-94-5 CHROMIC ACID

Item 65.2:
Compliance Certification shall include the following monitoring:

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

Quebecor completed the required performance test for the chromium electroplating tanks identified as CHR04 on April 4, 2002. The test results demonstrated compliance with the total chromium emissions limit of 0.03 mg/dscm. Continued compliance is assured via the surrogate compliance indicator described below.

CHR04 is equipped with multiple control devices. A fume suppressant is followed by a plate and baffle scrubber which catches droplets of chromium mist. A composite mesh pad filter removes particles within the exhaust stream. The mesh pad is considered the main compliance indicator for the electroplating tanks. A magnehelic gauge measures the pressure drop across the mesh pad filter.

During the performance test conducted on April 4, 2002, the pressure drop across the mesh pad filter as measured by the magnehelic gauge was 2.2 inches of water column. Quebecor must record the pressure drop readings a minimum

of one time during each day of operation. The compliant range for pressure drop readings is no more than +/- 2 inches of water column from the performance test values.

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. Quebecor must ensure that appropriate maintenance procedures are followed so that the mesh pad filter performs effectively.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: .20 inches of water
Upper Permit Limit: 4.2 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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 66: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 212.10(c)(1)

Item 66.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0006
Process: 06A

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

Item 66.2:
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 2% 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 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 PERMIT 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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 68: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 228.7

Item 68.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0006
Process: 06B

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

Item 68.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
Paper coating lines may contain a maximum of 2.9 pounds of VOC (minus water and excluded VOC) per gallon of coating as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING

Parameter Monitored: VOC CONTENT
Upper Permit Limit: 2.9 pounds per gallon
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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 67: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 6NYCRR 228.10

Item 67.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0006
Process: 06B

Item 67.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Part must:
(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
(d) not 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. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
(f) minimize spills during the handling and transfer of coatings and VOC solvents; and
(g) beginning on January 1, 2005, clean spray guns used to apply mobile equipment repair and refinishing or color-matched coatings by one of the following:
(1) an enclosed spray gun cleaning system that is kept closed when not in use;
(2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
(3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 69: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

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

Item 69.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0008

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

Item 69.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Quebecor operates six flexographic printing presses which use a cold-set, isoparaphinic (wax), solvent-based, VOC-containing 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 these presses.

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. 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% by volume or less of VOC and 75% by volume or more of nonreactive volatiles. Compliance will be demonstrated through sample test data, required calculations, and manufacturer certifications.

Quebecor generally has a specific ink formulation, which rarely changes, for the flexographic presses. An initial analysis of the as-applied, flexographic ink was completed on May 5, 2000. The ink must be re-analyzed if the formulation is changed. 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). Compliance is demonstrated by comparing the two values to show that the "volume fraction VOC in the actual ink" is less than the "maximum volume fraction VOC in the complying ink".

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.

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.

The results of any analysis or other procedure used for establishing compliance with this Part must be provided to the Department's representative. Department representatives 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 PERMIT 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 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 70: Compliance Certification
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable Federal Requirement: 40CFR 63.821(b)(2), Subpart KK

Item 70.1:
The Compliance Certification activity will be performed for:

Emission Unit: E-G0008

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

Item 70.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:

The six wide-web flexographic presses identified as emission sources EQ112, EQ114, EQ116, EQ117, EQ118, and EQ119 are subject to 40CFR60 Subpart KK since they are located at a facility which is a major source of hazardous air pollutants (HAPs). Quebecor has chosen to limit use of organic HAP per wide-web flexographic press per month to no more than 400 kilograms to comply with the criteria stated in 40CFR 63.821(b)(2). This allows the wide-web flexographic presses to be subject only to compliance demonstration and initial notification requirements as stated below.

If any wide-web flexographic press does not comply with the limited HAP usage criteria for any month, it will immediately be subject to all relevant requirements of Subpart KK and will no longer be eligible to use the exempt provision even if in subsequent months the affected source does comply with the criteria.

Quebecor must maintain the appropriate records to demonstrate compliance with the limited HAP usage criteria. 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.

Quebecor is also required to submit an initial notification as required by 40CFR63.9(b), Subpart A.

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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 71: **Contaminant List**
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable State Requirement: ECL 19-0301

Item 71.1:
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 72: Unavoidable noncompliance and violations
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable State Requirement: 6NYCRR 201-1.4

Item 72.1:
At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

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

of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 73: Air pollution prohibited
Effective between the dates of 08/30/2007 and 08/29/2012

Applicable State Requirement: 6NYCRR 211.2

Item 73.1:
No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.