



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1430-00310/00001
Mod 0 Effective Date: 02/04/2008 Expiration Date: No expiration date.
Mod 1 Effective Date: 07/17/2008 Expiration Date: No expiration date.

Permit Issued To: DUAL PRINTING INC
340 NAGEL DR
BUFFALO, NY 14225

Contact: JAMES J SABIO
DUAL PRINTING INC
340 NAGEL DR
BUFFALO, NY 14225
(716) 684-3825

Facility: DUAL PRINTING INC
340 NAGEL DR
CHEEKTOWAGA, NY 14225

Contact: ROY LARUE
DUAL PRINTING INC
340 NAGEL DR
BUFFALO, NY 14225
(716) 684-3825

Description:

AIR STATE FACILITY (ASF) PERMIT DESCRIPTION
DUAL PRINTING, INC.
DEC I.D. NO. 9-1430-00310
MOD 1

Dual Printing, Inc. is a commercial sheet-fed/web offset lithographic printing facility that produces various types of printed products for its customers. The Facility, which is located at 340 Nagel Drive in Cheektowaga, New York, emits particulates and volatile organic compounds (VOCs), including hazardous air pollutants (HAPs), contained in the inks, fountain solution, blanket wash, developers, cleaners, adhesives and other products used throughout the facility. The Facility operates 24 hours per day, 6 days per week in a basic nonattainment area for ozone. The Standard Industrial Classification Code for Dual Printing, Inc. is 2752 - Commercial Printing, Lithographic. The ASF permit includes a limit on facility-wide emissions of total VOCs, total HAPs and individual HAPs to less than the applicability thresholds of 50 tpy, 25 tpy and 10 tpy, respectively, which would otherwise require a Title V permit and compliance with New Source Review requirements for new projects and reasonably available control technology (RACT) requirements for graphic arts facilities.

Currently, Dual Printing, Inc. operates eight non-heatset off-set lithographic presses, including two 10 color presses, one 8-color press, two 5-color presses, one 4-color press and two 2-color presses. The



VOCs and HAPs from four of these emission sources are exhausted to the ambient air via four emission points. Fugitive VOCs and HAPs from the other presses are emitted through seven additional vents and other building openings. This minor permit modification is for the construction and operation of a new 4-color heatset offset lithographic printing press with an integrated dryer and recuperative thermal oxidizer to control VOC and HAP emissions from heatset inks and fountain solution. The new press is identified as Emission Source 40002 and the integrated dryer and RTO are identified as Emission Source Control RTO01. The operation of the press with heatset inks is identified as Process 002 and the automatic cleaning of the press with solvent impregnated rolls is identified as ES BW003. All printing operations are contained in Emission Unit (EU) A-10000.

Dual Printing, Inc. must continue to operate within the limits of the emission CAPs specified in this permit and comply with the particulate and opacity limits and reporting and recordkeeping requirements. Compliance with the emission CAPs shall be determined by summing the individual monthly total VOC, total HAP and individual HAPs emitted from all sources at the facility during any consecutive 12-month period. A report is due within 30 calendar days of the end of each year certifying compliance with these emission limits. Additional requirements for the new heatset press include operation only while maintaining a vacuum in the dryer to capture VOCs and operating the RTO at a minimum temperature of 1400 degrees Fahrenheit with 0.845 second residence time to achieve a minimum 95% destruction efficiency. The combustion chamber temperature of the RTO must be continuously monitored and recorded. Operation, maintenance, start-up and shutdown must be carried out in accordance with the permit and the procedures detailed in the Preventative Maintenance, Operating and Emergency Shutdown Plan, which must be submitted to NYSDEC for approval within 60 days of start-up. This Plan, identified under 6NYCRR200-7 -Maintenance of Equipment, will be an addendum to the ASF permit.

Once the construction is complete and ES 40002 and ES Control RTO01 are operating properly, Dual Printing will shutdown and remove one 10-color press identified as Emission Source 10001 and Emission Point 0003 associated with this source. At that time, the emission source and emission point will be expired through an additional modification of the permit.

This Air State Facility permit contains a listing of the applicable federal, state and compliance monitoring requirements for the facility. The Preventative Maintenance, Operating and Emergency Shutdown Plan will be contained in Appendix A once it is approved by NYSDEC.

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: DOUGLAS E BORSCHER
270 MICHIGAN AVE
BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
 - Applications for permit renewals, modifications and transfers
 - Applications for Permit Renewals and Modifications
 - Permit modifications, suspensions or revocations by the Department
 - 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 ******
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



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: DUAL PRINTING INC
340 NAGEL DR
BUFFALO, NY 14225

Facility: DUAL PRINTING INC
340 NAGEL DR
CHEEKTOWAGA, NY 14225

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

Mod 0 Permit Effective Date: 02/04/2008

Permit Expiration Date: No expiration date.

Mod 1 Permit Effective Date: 07/17/2008

Permit Expiration Date: No expiration date.



LIST OF CONDITIONS

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 - 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

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1-1 6NYCRR 200.7: Maintenance of Equipment
- 1 6NYCRR 200.3: False statement
- 1-2 6NYCRR 200.7: Compliance Demonstration
- 2 6NYCRR 201-7.2: Facility Permissible Emissions
- *1-3 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-4 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-5 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-6 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-7 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-8 6NYCRR 201-7.2: Capping Monitoring Condition
- 1-9 6NYCRR 212.4(c): Compliance Demonstration
- 1-10 6NYCRR 212.6(a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 7 ECL 19-0301: Contaminant List
- 8 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 9 6NYCRR 201-5: Emission Unit Definition
- 10 6NYCRR 211.2: Air pollution prohibited
- 1-11 6NYCRR 211.2: Compliance Demonstration

Emission Unit Level

- 12 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 1-12 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6NYCRR Part 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

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



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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6NYCRR Part 201-1.5

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

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

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

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

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

(4) The facility owner and/or operator notified the Department

within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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



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

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

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

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

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

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

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

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

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

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air



pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item L: Open Fires - 6 NYCRR Part 215

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

Item M: Permit Exclusion - ECL 19-0305

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

Item N: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS



The following conditions are federally enforceable.

Condition 1-1: Maintenance of Equipment
Effective between the dates of 07/17/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 200.7

Item 1-1.1:

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 1: False statement
Effective between the dates of 02/04/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 200.3

Item 1.1:

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

Condition 1-2: Compliance Demonstration
Effective between the dates of 07/17/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 200.7

Item 1-2.1:

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

Emission Unit: A-10000

Process: 002

Emission Source: RTO01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Dual Printing operates a Megtec Dual-Dry TNV 119 Integrated Air Flotation Dryer and Oxidizer (Emission Source Control RTO01) to control VOC emissions from one 4-color web heatset lithographic printing press (ES 40002), with a potential to emit 244 tons of VOCs per year. When operated and maintained properly, the integrated negative pressure dryer and recuperative thermal oxidizer (RTO) will allow Dual Printing to



maintain VOC emissions below the facility emission limit specified in this permit to avoid the requirements of 6NYCRR201-6, "Title V Facility Permits", 6NYCRR234, "Graphic Arts" and 6NYCRR231-2, "New Source Review". The Megtec Dual-Dry TNV 119 will control the opacity of the stack gases from Emission Point 00005 to comply with the opacity limit of less than 20% specified under 6NYCRR212.6, "Opacity of emissions limited". In addition, the Megtec Dual-Dry TNV 119 will allow Dual Printing to maintain contaminant emissions below the annual guidance concentrations (AGCs) and short-term guidance concentrations (SGCs) specified in DAR-1: "Guidelines for the Control of Toxic Ambient Air Contaminants" and to control nuisance odors associated with EP 00005 in accordance with 6NYCRR211.2, "Air Pollution Prohibited".

The owner or operator of any facility which uses air pollution control equipment to comply with an emissions cap, standard, limit or any other requirement must operate and maintain such equipment in a manner consistent with good engineering practices. Within 60 days after start-up of ES 40002 and ES Control RTO01, Dual Printing shall prepare and submit to NYSDEC a Preventative Maintenance, Operating and Emergency Shutdown Plan based on the requirements of this permit and the manufacturer's operation and maintenance manual(s) for ES Control RTO01 and any associated equipment. Operation, inspection, maintenance, calibration, monitoring, recordkeeping and reporting associated with ES Control RTO01 shall be conducted in accordance with the requirements specified in this permit and the Preventative Maintenance, Operating and Emergency Shutdown Plan. The Plan must be approved by NYSDEC and shall be considered part of the Air State Facility permit.

Dual Printing shall include a certified statement in the Annual Compliance Certification Report indicating that all requirements as specified in this condition have been fulfilled during the calendar year. Any deviations shall be reported.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 2: Facility Permissible Emissions

Effective between the dates of 02/04/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2



Item 1-3.4:

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

Item 1-3.5:

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

Item 1-3.6:

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

Emission Unit: A-10000 Process: 002	Emission Point: 00005 Emission Source: RTO01
Emission Unit: A-10000 Process: 002	Emission Point: 00005 Emission Source: 40002
Regulated Contaminant(s): CAS No: 0NY998-00-0 VOC	

Item 1-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operation of the heatset press (ES 40002) is prohibited unless all three of the following conditions are met:

- the pressure inside the dryer is negative,
- the RTO is operating at the required minimum temperature of 1400 degrees Fahrenheit with at least 0.845 second residence time, and
- the combustion chamber temperature of the RTO is continuously monitored and recorded.

The Megtec Dual-Dry TNV 119 Integrated Air Flotation Dryer and Oxidizer is programmed to shutdown the printing press if the dryer pressure becomes positive for more than 60 seconds or the temperature of the combustion chamber falls below 1400 degrees Fahrenheit for more than 15 minutes. In accordance with the Preventative Maintenance, Operating and Emergency Shutdown Plan, at times when the dryer/RTO shuts down during the printing process due to problems with the dryer/RTO such as malfunction, failure to maintain 1400 degree F, failure to maintain negative pressure, insufficient residence time, etc., Dual Printing shall record in a permanently bound logbook or electronically via the data management system all pertinent details including, but not limited to, the



Reports due 30 days after the reporting period.
The initial report is due 1/30/2009.
Subsequent reports are due every 12 calendar month(s).

Condition 1-5: Capping Monitoring Condition
Effective between the dates of 07/17/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Item 1-5.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6
6NYCRR 231-2
6NYCRR 234

Item 1-5.2:

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

Item 1-5.3:

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

Item 1-5.4:

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

Item 1-5.5:

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

Item 1-5.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-5.7:

Compliance Demonstration shall include the following monitoring:

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



Dual Printing has an annual potential to emit (PTE) approximately 316 tons per year (tpy) of volatile organic compounds (VOCs) from all emission sources throughout the facility. This exceeds the major source applicability threshold of 50 tpy for VOCs specified under 6NYCRR201-6 for Title V Facility Permits, 6NYCRR234: Graphic Arts and 6NYCRR231-2: New Source Review (NSR) in Nonattainment Areas and Ozone Transport Regions. Dual Printing has chosen to accept limitations to restrict the PTE VOCs from the facility to 49.0 tpy or less based on a 12-month rolling total and, therefore, is not required to obtain a Title V permit. By restricting the PTE VOCs to 49.0 tpy, Dual Printing Inc. will not be subject to the control requirements specified under 6NYCRR234 and will eliminate the need to determine the applicability of 6NYCRR231-2.

Facility-wide emissions of VOCs shall not exceed 49.0 tpy as determined by summing the individual monthly total VOC emissions during any consecutive 12-month period from all VOC contributing activities. Monthly total VOC emissions shall be determined by summing emission rates (ER) as follows. Each calendar month, the facility-wide 12-month rolling total for VOC emissions shall be computed by adding the current monthly VOC emissions to the VOC emissions for the previous 11 months.

$$\text{Monthly Total VOCs (lbs/mo)} = \text{ER1} + \text{ER2} + \text{ER3} + \text{ER4} + \text{ER5} + \text{ER6} + \text{ER7} + \text{ER8}$$

NONHEATSET INKS and VARNISHES (only varnish that is pigment free, nonheatset ink that is applied as overprint)

The emissions from nonheatset inks (ER1) may be determined using a 95% retention factor as follows:

$$\text{ER1} = \text{nonheatset ink/varnish (new, recycled and rebled)} \\ \text{usage rate}^* \text{ (lbs/mo)} \times \% \text{Total VOC Content of Ink}^{**} / 100 \times 0.05$$

HEATSET INKS:

At times when the pressure of the dryer is maintained at a vacuum, 100% capture efficiency for VOCs from heatset inks may be assumed. When the recuperative thermal oxidizer (RTO) is operating at the minimum required temperature of 1400 deg F at 0.845 second residence time, 95% destruction efficiency for VOCs may be assumed. When these conditions are met, the VOC emission rate (ER2) may be calculated using a 20% retention factor for VOCs contained in the ink as follows:

$$\text{ER2} = \text{heatset ink (new, recycled, rebled)} \\ \text{usage rate}^* \text{ (lbs/mo)} \times \% \text{Total VOC Content of Ink} / 100 \times 0.8 \times 0.05$$



Uncontrolled Emissions: If, for any reason (i.e., malfunction), the heatset printing process is carried out while the dryer is unable to maintain the minimum required vacuum, the RTO is operating lower than the required temperature or original continuous temperature recorder data are not available, the 100 % capture efficiency and the 95 % destruction efficiency shall not be used to determine VOC emissions. The emission rate (ER3) calculated for this time period as follows shall be added to the monthly emission rate.

ER3 = heatset ink (new, recycled and rebled) usage rate* (lbs) x %Total VOC Content of Ink/100 x 0.8

FOUNTAIN SOLUTION USED WITH HEATSET INK:

At times when the dryer is maintained at a vacuum and the RTO is operating at a minimum of 1400 degrees Fahrenheit at 0.845 second residence time, it may be assumed that 70% of the VOCs contained in the fountain solution are captured by the dryer and 95% of these VOCs are destroyed.

When these conditions are met, the VOC emission rate (ER4) shall be calculated as follows:

ER4 = usage rate* (lbs/mo) x (%Total VOC Content of product**/100) x 0.335

Uncontrolled Emissions: If, for any reason (i.e., malfunction), the heatset press continues to operate when the required vacuum is not maintained, the temperature of the RTO falls below 1400 deg F or original continuous temperature recorder data are not available, 100% of the VOCs from the fountain solution shall be assumed to be emitted to the ambient air. The emission rate (ER5) calculated for this time period shall be added to the monthly VOC emission rate.

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

SOLVENTS (fountain solution and fountain solution additives used with coldset inks; blanket wash; plate cleaners, metering roller cleaners, degreasers/parts washer fluid, and other cleaning solvents or products containing VOCs), COATINGS, VARNISHES, ETC. USED DURING THE PRINTING PROCESS:

Assuming that 100% of the VOCs contained in these products are emitted to the ambient air, the emission rate (ER6) shall be calculated as follows:

ER6 = usage rate* (lbs/mo) x %Total VOC Content of product**/100

BLANKET WASH WITH A VOC COMPOSITE VAPOR PRESSURE OF 10 MM



HG @ 20 DEG C USED FOR THE MANUAL CLEANING OF PRESSES ONLY
IF SHOP TOWELS ARE STORED IN CLOSED CONTAINERS: A closed container is a container with a tight fitting lid, which must be sealed at all times except when adding or removing soiled towels. VOC emissions from low composite vapor pressure blanket wash (see above) used with shop towels stored in closed containers (ER7) may be calculated as follows:

ER7 = usage rate* (lbs/mo) x %Total VOC Content of product**/100 * 0.50

OTHER SOURCES of VOCs including Conventional & Digital Prepress Operations, Postpress Operations, Exempt & Trivial Activities (See 6NYCRR201-3) and Fugitives not accounted for elsewhere (see 6NYCRR234.2(b)(15)): It shall be assumed that 100% of the VOCs contained in these products are emitted to the ambient air. If total facility VOC emissions are less than 45.0 tons per year on a 12-month rolling total basis, the facility will not be required to calculate VOC emissions from operations/activities in the "other sources" category. Otherwise, the VOC emissions from "other sources" shall be included in the facility-wide VOC emissions calculations. The emission rate (ER8) shall be calculated as follows:

ER8 = usage rate* (lbs/mo) x %Total VOC Content of Product**/100

*Do not subtract waste ink, blanket wash, parts washer/degreaser solvent and any other waste from the usage rate.

** When an MSDS or Product Data Sheet shows a range for chemical content, the maximum content shall be used to determine emissions.

The total VOCs contained in waste sent offsite may be subtracted from the total facility VOC emissions calculated from purchase/usage records, as described above ONLY if the VOC content of the waste has been determined by an unaffiliated lab or waste disposal facility and can be verified by RCRA waste disposal records for this facility.

The Facility shall keep and maintain accurate records for VOC emitting activities to determine total VOC emissions based on verifiable data. These records shall include:

- a current list of all VOC containing products used for printing related activities throughout the facility with current information on the manufacturer and product name/code, VOC content, vapor pressure and other pertinent data;
- a monthly log of the consumption of any product containing VOCs used for printing related activities



throughout the facility;

- any other information that supports the monthly log, such as purchase orders, invoices, equipment operation, maintenance and repair logs/records, production records, metering logs, original continuous temperature recordings for the RTO, dryer pressure readings, etc.;

- all calculations used to determine the monthly emissions; and

- information, such as make, model, maximum design process rate or throughput, etc. on equipment, including control equipment, used in any prepress, press and postpress operation which emit VOCs.

Within 30 days following each calendar year, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the 49 ton per year limit imposed by this VOC emissions cap. This shall include a VOC summary report which shall list the products used with reference to the associated category, i.e. inks, fountain solution, blanket wash, etc., the corresponding VOC contents, the quantities used monthly, emission factors used to calculate VOC emissions, VOCs sent off site as waste if subtracted from total facility VOC emissions, the monthly VOC emissions with the monthly total, the rolling 12-month VOC emissions for each consecutive month of the period and a comparison to the 49 tpy limit. If VOCs contained in waste are subtracted from the total VOC emissions calculated based on usage, a copy of the RCRA reports, analyses and any other supporting documentation shall be included with the Annual Compliance Certification Report .

All submittals to the Department shall be certified by the Facility's responsible official as to the truth, completeness, and accuracy of all information recorded and reported.

To ensure compliance with this emission limitation, a stack test may be required at NYSDEC's discretion.

Parameter Monitored: INKS, SOLVENTS AND ADHESIVES

Upper Permit Limit: 49.0 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 1-6: Capping Monitoring Condition

Effective between the dates of 07/17/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2



Item 1-6.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-6.2:

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

Item 1-6.3:

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

Item 1-6.4:

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

Item 1-6.5:

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

Item 1-6.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 1-6.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

To avoid the requirements of 6NYCRR201-6, Title V Facility Permits, actual facility-wide emissions of HAPs shall not exceed 24 tpy as determined by summing the individual monthly HAP emissions, including individual HAPs that have a PTE less than 10 tpy, during any consecutive 12-month period from all HAP contributing activities. Monthly and 12-month rolling totals of HAPs shall be calculated as described in the capping condition for VOCs specified under 6NYCRR201-7.2, except that HAPs from "other sources" shall be included when actual total



HAP emissions equal 20.0 tpy. The recordkeeping and reporting requirements specified under 6NYCRR201-7.2 also apply to total HAPs. All submittals to the Department shall be certified by the Facility's responsible official as to the truth, completeness, and accuracy of all information recorded and reported.

Parameter Monitored: HAP
Upper Permit Limit: 24.0 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2009.
Subsequent reports are due every 12 calendar month(s).

Condition 1-7: Capping Monitoring Condition
Effective between the dates of 07/17/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Item 1-7.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6
6NYCRR 231-2
6NYCRR 234

Item 1-7.2:

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

Item 1-7.3:

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

Item 1-7.4:

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

Item 1-7.5:

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

Item 1-7.6:



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

Emission Unit: A-10000 Emission Point: 00005
Process: 002 Emission Source: RTO01

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

Item 1-7.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The minimum temperature required to achieve 95% destruction of the VOCs in the combustion chamber of the RTO is 1400 degrees Fahrenheit at a minimum residence time of 0.85 second, based on the manufacturer's guarantee. To verify compliance with the minimum temperature requirement, the combustion chamber temperature must be continuously monitored and recorded. The continuous temperature recorder shall be installed, operated, calibrated and maintained in accordance with this permit and the manufacturer's recommendations. Original recorder charts and/or electronic data showing continuous monitoring and recording of the combustion chamber operating temperature and records of calibration, maintenance and repair shall be kept onsite. All electronic data shall be stored securely and backed up on a daily basis. Dual Printing shall include a certified statement in the Annual Compliance Report indicating that all requirements as specified in this condition have been fulfilled during the calendar year. Any deviations shall be reported. Periods of heatset press operation that have no temperature records shall be considered uncontrolled. A stack test shall be conducted at the discretion of NYSDEC.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 1-8: Capping Monitoring Condition

Effective between the dates of 07/17/2008 and Permit Expiration Date



Applicable Federal Requirement:6NYCRR 201-7.2

Item 1-8.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-8.2:

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

Item 1-8.3:

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

Item 1-8.4:

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

Item 1-8.5:

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

Item 1-8.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000111-46-6	ETHANOL, 2,2'-OXYBIS-
CAS No: 000112-34-5	ETHANOL, 2-(2-BUTOXYETHOXY)-
CAS No: 000127-18-4	PERCHLOROETHYLENE
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 000110-54-3	HEXANE

Item 1-8.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

To avoid the requirements of 6NYCRR201-6, Title V Facility Permits, facility-wide actual emissions of individual HAPs shall not exceed 9 tpy each as determined by summing the individual monthly HAP emissions during any consecutive 12-month period from all HAP contributing



activities. This monitoring condition shall apply to each individual HAP emitted that has a potential to emit (PTE) equal to or greater than 10 tpy. The individual HAPs list is not all-inclusive and may change with products and usage rates. Monthly emissions and 12-month rolling totals for individual HAPs shall be calculated as described in the capping condition for VOCs specified under 6NYCRR201-7.2, except that individual HAPs from "other sources" shall be included when an individual HAP's actual facility emissions equals 7.0 tpy. The recordkeeping and reporting requirements specified under 6NYCRR201-7.2 also apply to individual HAPs. All submittals to the Department shall be certified by the Facility's responsible official as to the truth, completeness, and accuracy of all information recorded and reported.

Parameter Monitored: HEXANE
Upper Permit Limit: 9.0 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2009.
Subsequent reports are due every 12 calendar month(s).

Condition 1-9: Compliance Demonstration
Effective between the dates of 07/17/2008 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 1-9.1:

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

Emission Unit: A-10000 Emission Point: 00001

Emission Unit: A-10000 Emission Point: 00002

Emission Unit: A-10000 Emission Point: 00003

Emission Unit: A-10000 Emission Point: 00004

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

Item 1-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions from the application of spray powder and any other particulate generating activity are



restricted as follows:

For an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The exhaust hood for each emission point shall be equipped with a particulate filter that covers the entire exhaust opening and is capable of meeting or exceeding the particulate limit. To ensure maximum removal efficiency and minimize particulate emissions, application equipment and control equipment shall be utilized and maintained in accordance with manufacturer's specifications. To verify maintenance practices, filter changes and cleaning shall be recorded in a log book and purchase orders/invoices shall be kept and made readily available for review by representatives from the NYSDEC or USEPA upon request. Records of filter type, make and model number, removal efficiency, manufacturer recommended maintenance requirements and any other pertinent information shall also be kept onsite and be available upon request. All records shall be maintained onsite for 5 years.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: USEPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-10: Compliance Demonstration

Effective between the dates of 07/17/2008 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 1-10.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-10000 Emission Point: 00001

Emission Unit: A-10000 Emission Point: 00002

Emission Unit: A-10000 Emission Point: 00003

Emission Unit: A-10000 Emission Point: 00004

Emission Unit: A-10000 Emission Point: 00005

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



Item 1-10.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Compliance with this requirement shall be determined by the facility owner/operator by conducting a daily survey of visible emissions from the emission points specified in this condition when printing processes are in operation. Unless a certified visible emissions evaluator is onsite to verify that the opacity of facility emissions is less than 20%, if any visible emissions (> 0 %) are identified, the permittee shall determine the cause, make the necessary correction, and verify that the visible emissions problem has been corrected. If visible emissions continue, within the next operating day, a certified visible emissions evaluator shall conduct a Method 9 assessment of the sources associated with the potential noncompliance to determine the degree of opacity. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

The results of daily observations when visible emissions are present must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack: date and time of day; observer's name; identity of emission point; weather condition; a description of the plume observed and location of observer. Inclement weather conditions shall be recorded for those days when observations are prohibited. Records of visible emissions observations (and results of any follow-up Method 9 analysis), investigations and corrective actions shall be kept on-site in a format acceptable to the Department. The logbook must be retained at the facility for five (5) years after the date of the last entry. Dual Printing shall include a certified statement in the Annual Compliance Certification Report indicating that all requirements as specified in this condition have been



fulfilled during the calendar year. Any deviations shall be reported.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: 9

Monitoring Frequency: DAILY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 7: Contaminant List
Effective between the dates of 02/04/2008 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 7.1:

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

CAS No: 000111-46-6
Name: ETHANOL, 2,2'-OXYBIS-

CAS No: 000112-34-5
Name: ETHANOL, 2-(2-BUTOXYETHOXY)-

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

CAS No: 000110-54-3
Name: HEXANE

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 000127-18-4
Name: PERCHLOROETHYLENE

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

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

Condition 8: Unavoidable noncompliance and violations
Effective between the dates of 02/04/2008 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 8.1:

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 9: Emission Unit Definition
Effective between the dates of 02/04/2008 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 9.1(From Mod 1):

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

Emission Unit: A-10000

Emission Unit Description:

This emission unit contains lithographic printing operations including direct to plate pre-press operations, off-set sheet-fed and web lithographic printing presses and associated activities and post-press operations. VOC and HAP emissions generated by these activities, come from the inks, fountain solution, developers, solvent based cleaners, blanket wash, toners, adhesives, degreasers, etc used throughout the facility at various emission sources (ES) and processes. Emission Sources contained in this Emission Unit include eight non-heatset off-set



lithographic presses: (2) 10-Color press identified as ES 10001 and ES 10002; (1) 8-Color press identified as ES 80001, (2) 5-Color presses identified as ES 50001 and ES 50002; (1) 4-Color press identified as ES 40001 and (2) 2-Color presses identified as ES 20001 and ES 20002; (1) 4-Color heatset web off-set lithographic press identified as ES 40002; digital and conventional pre-press operations, identified as ES PRE01; and various post-press operations identified as ES POST1. Most of the volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) from the inks and fountain solution emitted from ES 40002 during printing are captured and destroyed via the Megtec Dual-Dry TNV 119 Integrated Air Flotation Dryer and Oxidizer, identified as Emission Source Control RTO01. The dryer operates at 575 degrees F and maintains a negative pressure of -0.3 in water to capture VOC emissions from the printing process. The recuperative thermal oxidizer (RTO) has a 95% destruction efficiency at the required minimum combustion chamber temperature of 1400 degrees F and residence time of 0.845 second. The software for ES Control RTO01 monitors the dryer pressure and the combustion chamber temperature and stops the press if any of these operating requirements is not met. Lithographic presses identified as ES 10001, ES 10002, ES 80001, ES 50001, and ES 50002 are each equipped with automatic blanket wash units, identified as ES BW002. All other nonheatset presses are manually cleaned with solvents and towels, identified as ES BWO01. The cleaning of the heatset press using a Baldwin IMPACT Auto Blanket & Impression Cleaning System with a Prepac Roll is identified as ES BW003. Some manual cleaning is also carried out on the heatset press. The VOCs, HAPs and particulates from ES 10002, ES 80001, ES 10001 and ES 50001 are exhausted to the outdoor air via emission points (EP) 0001, EP 0002, EP 0003 and EP 0004, respectively. Each of those emission sources are equipped with an infrared heater located at the delivery end of each press to shorten drying time. Each exhaust hood is equipped with a filter with a 65% removal efficiency for particulates during the application of spray powder during the printing process. Nonheatset lithographic printing operations are identified as Process 001. Heatset lithographic printing operations are identified as Process 002. Dual Printing, Inc recycles blanket wash via distillation onsite.

Building(s): 1

Condition 10: Air pollution prohibited
Effective between the dates of 02/04/2008 and Permit Expiration Date

Applicable State Requirement:6NYCRR 211.2



Item 10.1:

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

Condition 1-11: Compliance Demonstration
Effective between the dates of 07/17/2008 and Permit Expiration Date

Applicable State Requirement:6NYCRR 211.2

Item 1-11.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0	HAP
CAS No: 0NY998-00-0	VOC

Item 1-11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Openings to the outside of the building, such as doors, windows etc., near printing operations or other VOC generating activities shall not be left open for extended periods of time, unnecessarily, unless a system is in place, such as negative pressure - verified by a velometer or similar device - or a physical barrier, to minimize the release of contaminants from Dual Printing to the surrounding neighborhood. Activities that necessitate opening doors include maintenance, loading and unloading trucks and other activities required for business. Doors shall be open only the minimum time required to complete a task and shall be closed immediately upon completion or during periods of inactivity while conducting the task. Dual Printing shall make additional changes to their operations to reduce emissions and/or mitigate odors, if necessary. Any complaints received by Dual Printing regarding odors caused by the facility or associated operations shall be recorded in a permanently bound logbook and reported to the NYSDEC within 2 calendar days of occurrence. The cause of the problem shall be investigated and corrective action taken immediately. Details shall be provided to the NYSDEC in a written report within 30 days of the complaint. Dual Printing shall include a certified statement in the Annual Compliance Certification Report indicating that all requirements as specified in this condition have been fulfilled during the calendar year. Any deviations shall



be reported. All records shall be maintained onsite for 5 years and shall be readily available upon request by the NYSDEC and/or USEPA.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Condition 12: Emission Point Definition By Emission Unit Effective between the dates of 02/04/2008 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 12.1(From Mod 1):

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

Emission Unit: A-10000

Emission Point: 00001

Height (ft.): 36 Length (in.): 16 Width (in.): 16
NYTMN (km.): 4757.668 NYTME (km.): 194.2 Building: 1

Emission Point: 00002

Height (ft.): 31 Length (in.): 12 Width (in.): 15
NYTMN (km.): 4757.668 NYTME (km.): 194.2 Building: 1

Emission Point: 00003

Height (ft.): 31 Diameter (in.): 12
NYTMN (km.): 4757.668 NYTME (km.): 194.2 Building: 1

Emission Point: 00004

Height (ft.): 31 Length (in.): 10 Width (in.): 12
NYTMN (km.): 4757.668 NYTME (km.): 194.2 Building: 1

Emission Point: 00005

Height (ft.): 34 Diameter (in.): 12
NYTMN (km.): 4757.612 NYTME (km.): 194.214 Building: 1

Condition 1-12: Process Definition By Emission Unit Effective between the dates of 07/17/2008 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 1-12.1(From Mod 1):

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

Emission Unit: A-10000

Process: 001

Source Classification Code: 4-05-004-33

Process Description:



This process consists of offset lithographic printing operations in which nonheatset inks are applied to paper substrate (Emission Sources 10001, 10002, 80001, 50001, 50002, 40001, 20001 and 20002). The nonheatset inks have very low volatility. The inks dry via absorption or oxidation instead of evaporation, which results in 95% of the VOCs being retained by the substrate. Four of the lithographic presses are cleaned manually with a solvent (blanket wash) and shop towels, identified as ES BWO01. The remaining presses are equipped with automatic systems that use solvent (blanket wash) to clean the presses, identified as ES BW002.

Emission Source/Control: CTRL1 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: CTRL2 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: CTRL3 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: CTRL4 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: 10001 - Process
Design Capacity: 13,000 sheets/hour

Emission Source/Control: 10002 - Process
Design Capacity: 13,000 sheets/hour

Emission Source/Control: 20001 - Process
Design Capacity: 9,000 sheets/hour

Emission Source/Control: 20002 - Process
Design Capacity: 8,000 sheets/hour

Emission Source/Control: 40001 - Process
Design Capacity: 8,000 sheets/hour

Emission Source/Control: 50001 - Process
Design Capacity: 15,000 sheets/hour

Emission Source/Control: 50002 - Process
Design Capacity: 10,000 sheets/hour

Emission Source/Control: 80001 - Process
Design Capacity: 15,000 sheets/hour

Emission Source/Control: BW002 - Process

Emission Source/Control: BWO01 - Process



Item 1-12.2(From Mod 1):

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

Emission Unit: A-10000

Process: 002

Source Classification Code: 4-05-004-21

Process Description:

This process consists of one offset lithographic printing press (Emission Sources 40002) in which heatset inks are applied to a continuous web and cured in a negative pressure, gas fired, hot air drying oven operated at 575 deg F. The VOC and HAP emissions from the dryer are controlled by a recuperative thermal oxidizer (RTO). The integrated dryer and RTO are identified as ES Control RTO01 and exhaust to the atmosphere through Emission Point 00005. The manual and automatic cleaning of the press with solvent (blanket wash) are identified as Emission Sources BWO01 and BW003, respectively.

Emission Source/Control: RTO01 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 40002 - Process

Design Capacity: 2,125 feet per minute

Emission Source/Control: BW003 - Process

Emission Source/Control: BWO01 - Process

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310

