

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

Facility Identification Data

Name: QUADGRAPHICS
Address: GRANDE INDUSTRIAL PK - 56 DUPLAINVILLE RD
SARATOGA SPRINGS, NY 12866

Owner/Firm

Name: QUADGRAPHICS INC
Address: W 224 N3322 DUPLAINVILLE RD
PEWAUKEE, WI 53072-4195, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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Air Permitting Facility Owner Contact:
Name: MICHAEL J EMERY
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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1

Modification Number: 2

10/02/2006



Summary Description of Proposed Project

They are removing three presses and changing formulation of the fountain solution. The change in fountain solution results in a decrease in VOC and HAP emissions.

Attainment Status

QUADGRAPHICS is located in the town of SARATOGA SPRINGS in the county of SARATOGA. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

The facility is a heat-set offset lithography printing and bindery plant that prints and binds magazines, catalogs, coupons and inserts. Bindery capability includes staple stitching and perfect binding and has in-line addressing and bundling.

Permit Structure and Description of Operations

The Title V permit for QUADGRAPHICS

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2

10/02/2006

more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

QUADGRAPHICS is defined by the following emission unit(s):

Emission unit UCRTOS - This Emission Unit contains eight (8) heatset web offset lithographic printing presses ducted to a bank of three (3) regenerative thermal oxidizers (ROTs). A minimum of two (2) RTOs must operate at all times during operation of more than one of the associated presses. If only one press is operating then only one RTO is required.

Emission unit UCRTOS is associated with the following emission points (EP):
00021, 00022, 00023

It is further defined by the following process(es):

Process: PR2 is located at Buildings 5 & 9, Building 9 - Heatset, web offset lithographic printing where a non-photochemically reactive, low vapor pressure offset ink is applied to paper. The ink is dried by direct, high velocity, hot air impingement driers which drive off approximately 85% of the ink solvent (35% of the ink volume). All presses are ducted to a bank of three (3) regenerative thermal oxidizers (RTOs). The following is a summary of the emission sources:

Press ID

- 00M68
- 00M76
- 00M78
- 00M79
- 00M87
- 00M85
- 0M110
- 0M121

Emission unit UPRESS - This Emission Unit contains 11 heatset web offset lithographic printing presses and associated catalytic oxidizers and RTOs.

Emission unit UPRESS is associated with the following emission points (EP):
00005, 00006, 00007, 00008, 00009, 00010, 00018, 00020

It is further defined by the following process(es):

Process: PRN is located at Building 1, 3 & 9, Building 1 - Heatset, web offset lithographic printing



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2 10/02/2006

where a non-photochemically reactive, low vapor pressure offset ink is applied to paper. The ink is dried by direct, high velocity, hot air impingement driers which drive off approximately 85% of the ink solvent (35% of the ink volume). The following is a summary of the emission source, control equipment emission point configuration and control type:

Press ID	Equip ID	EP ID	Control is Catalytic (C) or Non-Catalytic(D)
00M35	-->CA005	-->00005	-->C
00M57	-->CA008	-->00008	-->C
00M60	-->CA009	-->00009	-->C
00M61	-->CA010	-->00010	-->C
00M81	-->CA014	-->00010	-->C
0M20B	-->CA017	-->00010	-->C
00M95	-->CA018	-->00018	-->D
00M99	-->CA020	-->00020	-->D

Emission unit UTRIMS - Paper trim waste collection system consisting of a network of cyclone and baghouse particulate control devices.

Emission unit UTRIMS is associated with the following emission points (EP):

00101, 00102, 00103, 00105, 00106, 00107, 00108

It is further defined by the following process(es):

Process: TRM is located at Buildings 1-7, Building 1 - Paper trimmed in the printing and bindery operations is conveyed by an induced draft air handling system to a network of cyclone separators. The cyclones collect waste paper, which is transferred to bailers for shipment to waste paper recyclers, and emit waste paper particulate which consists of fiber, fillers, dry coatings and dry ink. Two of the emission points, 00102 and 00106, have additional emission control in which fine particulates are removed from the air stream by baghouse fabric filters, downstream of the cyclones, prior to exhausting to the atmosphere. The bags are 16 ounce singed polyester felt with 50 micron initial mesh size. The air loading is 10 cfm per square foot. The following is a summary of the control equipment and emission point configuration for the Trim collection system process fans "OFANS":

Control ID	EP ID
Cyclone #4, 0S101	----->00101
Baghouse #3, 0S102	----->00102
Cyclone #5, 0S103	----->00103
Cyclone #7, 0S105	----->00105
Baghouse #8, 0S106	----->00106
Cyclone #9, 0S107	----->00107
Baghouse #10, 0S108	----->00108

Title V/Major Source Status

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2 10/02/2006

QUADGRAPHICS is subject to Title V requirements. This determination is based on the following information:

This facility is major for the following permitted emissions:

CONTAMINANT PERMITTED EMISSION RANGE
 VOC > or = 250 TPY

Program Applicability

The following chart summarizes the applicability of QUADGRAPHICS with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

(CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2

10/02/2006

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2752	COMMERCIAL PRINTING LITHOGRAPH

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
4-05-004-01	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Lithographic - 2752
4-05-004-11	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Lithographic - 2752

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1

Modification Number: 2



10/02/2006

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
002807-30-9	2-PROPOXY ETHANOL (HAP)	> 0	but < 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL) (HAP)	> 0	but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 2.5	tpy but < 10 tpy
009004-70-0	CELLULOSE NITRATE	> 0	but < 2.5 tpy
007440-47-3	CHROMIUM (HAP)	> 0	but < 10 tpy
007440-48-4	COBALT (HAP)	> 0	but < 10 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)	> 0	but < 2.5 tpy
000100-41-4	ETHYLBENZENE (HAP)	> 0	but < 10 tpy
0NY100-00-0	HAP	>= 10	tpy but < 25 tpy
000108-21-4	ISOPROPYL ACETATE	> 0	but < 2.5 tpy
000067-63-0	ISOPROPYL ALCOHOL	> 0	but < 2.5 tpy
000067-56-1	METHYL ALCOHOL (HAP)	> 0	but < 10 tpy
000078-93-3	METHYL ETHYL KETONE (HAP)	> 0	but < 10 tpy
000091-20-3	NAPHTHALENE (HAP)	> 0	but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 25	tpy but < 40 tpy
0NY075-00-0	PARTICULATES	>= 50	tpy but < 100 tpy
007664-38-2	PHOSPHORIC ACID	> 0	but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE	> 0	but < 2.5 tpy
000071-91-0	TETRAETHYL AMMONIUM BROMIDE	> 0	but < 2.5 tpy
0NY998-00-0	VOC	>= 250	tpy
001330-20-7	XYLENE, M, O & P MIXT. (HAP)	> 0	but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	20
FACILITY	40CFR 64	COMPLIANCE ASSURANCE MONITORING	1-15, 1-16, 1-17
FACILITY	40CFR 68	Chemical accident prevention provisions	10
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	11
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1-1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	1-4
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	21
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	1-5
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	1-6
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	1-7
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	1-8
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	1, 12, 13
FACILITY	6NYCRR 201-6.5(a) (4)	General conditions	1-9
FACILITY	6NYCRR 201-6.5(a) (7)	General conditions	
Fees 1-2	6NYCRR 201-6.5(a) (8)	General conditions	1-10
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	2
FACILITY	6NYCRR 201-6.5(c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5(c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5(d) (5)	Compliance schedules	1-11
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	5
FACILITY	6NYCRR 201-6.5(f) (6)	Off Permit Changes	1-12
FACILITY	6NYCRR 201-7	Federally Enforceable	2-1,



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2 10/02/2006

Table with 4 columns: Facility Name, Regulation Reference, Description, and Page Number. Rows include Emissions Caps (2-2 to 2-8), Required emissions tests (1-13), Emission Statements - Applicability (6), Emission Statements - record keeping requirements (7), General Prohibitions - air pollution prohibited (24), General Prohibitions - visible emissions limited (1-14), General Process Emission Sources - opacity of emissions limited (19), Open Fires (1-3), New Source Review in Nonattainment Areas and Ozone Transport Region (2-1 to 2-7), Exhaust gas temperature (1-18, 1-20), and Handling, storage and disposal of volatile organic compounds (VOC) (1-19, 1-21).

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6NYCRR Part 201-3.3(a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial 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.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR 201-6.5(a)(4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)(ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2

10/02/2006

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, QUADGRAPHICS has been determined to be subject to the following regulations:

40CFR 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6NYCRR 201-6.5 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-7

This regulation sets forth requirements necessary to assure compliance with facility emission caps

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state.

6NYCRR 234 .4 (c)

Where the affected source has control equipment, then specific continuous monitors (as specified or otherwise required by the Commissioner) must be installed, calibrated, and operated at all times.

6NYCRR 234 .6

This requirement pertains to general provisions for the handling, storage and disposal of volatile organic compounds and applies to open containers except where production, sampling, maintenance or inspection procedures require operation access; and to actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

Compliance Certification

Summary of monitoring activities at QUADGRAPHICS:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	record keeping/maintenance procedures	1-15
FACILITY	monitoring of process or control device parameters as surrogate	1-16
FACILITY	monitoring of process or control device parameters as surrogate	1-17
FACILITY	record keeping/maintenance procedures	4
FACILITY	record keeping/maintenance procedures	5
FACILITY	monitoring of process or control device parameters as surrogate	2-1
FACILITY	monitoring of process or control device parameters as surrogate	2-2
FACILITY	monitoring of process or control device parameters as surrogate	2-3
FACILITY	work practice involving specific operations	2-4
FACILITY	intermittent emission testing	2-5
FACILITY	monitoring of process or control device parameters as surrogate	2-6
FACILITY	work practice involving specific operations	2-7
FACILITY	record keeping/maintenance procedures	6
U-TRIMS	record keeping/maintenance procedures	19
U-CRTOS	record keeping/maintenance procedures	1-19
U-PRESS	record keeping/maintenance procedures	1-21

Basis for Monitoring

Conditions 2-1 and 2-3: Capping from 6NYCRR 231-2

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

The Compliance Certification applies to:

Emission Unit: U-PRESS Emission Point: 00018
Emission Unit: U-PRESS Emission Point: 00020

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

Monitoring Description:

The thermal oxidizer for this press must provide for a reduction in emissions of volatile organic compounds (VOCs) of at least 97.5 percent.

During press operation, combustion chamber temperature of the oxidizer must be at least 1517 degrees F, (825 degrees C) and each oxidizer exhaust flow rate must be at least 1700 cfm (corrected to 70 degrees F) when the press speed is over 500 feet per minute. Startup of a press shall only occur if the inlet temperature of the RTO is at least 1517 degrees F.

Compliance with this monitoring condition also helps to assures compliance with 40 CFR 64 "Compliance Assurance Monitoring" requirements.

Parameters are as established during the last stack test.

Condition 2-2: Capping from 6NYCRR 231-2

The Compliance Certification applies to:

Emission Unit: U-CRTOS

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

Monitoring Description:

The thermal oxidizer for this press must provide for a reduction in emissions of volatile organic compounds (VOCs) of at least 97.5 percent.

During press operation, combustion temperature of the oxidizer must be at least 1500 degrees F, (815.6 degrees C) and each oxidizer inlet flow rate must be at least 10000 scfm. Startup of a press connected to the central RTO system shall only occur if the combustion temperature of the RTO is at least 1400 degrees F.

Compliance with this monitoring condition also helps to assures compliance with 40 CFR 64 "Compliance Assurance Monitoring" requirements.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

Parameters are as established during the last stack test.

Condition 2-4: Capping from 6NYCRR 231-2
The Compliance Certification applies to:

Emission Unit: U-CRTOS

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

Monitoring Description:

VOC emissions (including fugitive) are calculated from ink (VOC) content and thruput. Fugitives are assumed to be 70% capture for fountain solutions, 85% for ink solutions and 40% for all other solvents. Control is a minimum of 97.5%.

Upper Permit Limit: 130.97 tons per year

Condition 2-5: Capping from 6NYCRR 231-2

The Compliance Certification applies to:

Emission Unit: U-CRTOS	Process: PR2	Emission Source: CA021
Emission Unit: U-CRTOS	Process: PR2	Emission Source: CA022
Emission Unit: U-CRTOS	Process: PR2	Emission Source: CA023

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

Monitoring Description:

Affected RTOs must each maintain a minimum of 97.5% control of VOCs.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 97.5 percent reduction by weight (corrected to 7% O₂, dry basis)

Testing is required once per permit term to assure compliance with this requirement.

Condition 2-6: Capping from 6NYCRR 231-2

The Compliance Certification applies to:

Emission Unit: U-CRTOS

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

Monitoring Description:

Each central RTO for this press must provide for a reduction in

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

emissions of volatile organic compounds (VOCs) of at least 97.5 percent.

During press operation, combustion temperature of the oxidizer must be at least 1500 degrees F, (815.6 degrees C) and each oxidizer flow rate must be at least 10000 cfm. Startup of any press connected to the central RTO system shall only occur if the combustion temperature of the RTO is at least 1400 degrees F.

Compliance with this monitoring condition also helps to assure compliance with 40 CFR 64 "Compliance Assurance Monitoring" requirements.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1500 degrees Fahrenheit

Condition 2-7: Capping from 6NYCRR 231-2
The Compliance Certification applies to:

Emission Unit: U-PRESS

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

Monitoring Description:

VOC emissions (including fugitive) are calculated from ink (VOC) content and thruput. Fugitives are assumed to be 70% capture for fountain solutions, 85% for ink solutions and 40% for all other solvents. Control is a minimum of 95.0%. Presses M-95 and M-99 control is calculated at a minimum of 97.5%

Upper Permit Limit: 97.68 tons per year

Condition 1-15: Applicable Federal Requirement: 40CFR 64
The Compliance Certification applies to:

Emission Unit: U-CRTOS
Emission Unit: U-PRESS

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

Monitoring Description:

Quarterly maintenance shall include inspection and any necessary repair or replacement of control burners, temperature sensors and other elements that could affect oxidizer performance.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

The CO levels of all oxidizer exhausts shall be monitored quarterly. If the CO concentration is greater than 50 ppm, the press and oxidizer shall be immediately inspected adjusted and/or repaired as necessary. After completion of the maintenance, the stack shall be retested and the CO concentration entered in the permanent log record.

The CO concentration in the exhaust of a properly performing catalytic oxidizer is 40 ppm. When the CO level is found to exceed 50 ppm the unit may be performing below design efficiency.

Condition 1-16: Applicable Federal Requirement: 40CFR 64
The Compliance Certification applies to:

Emission Unit: U-PRESS Emission Point: 00005
Emission Unit: U-PRESS Emission Point: 00008
Emission Unit: U-PRESS Emission Point: 00009
Emission Unit: U-PRESS Emission Point: 00010

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

Monitoring Description:

The catalytic oxidizers for these presses must provide for a reduction in emissions of volatile organic compounds (VOCs) of at least 95.0 percent.

The inlet air temperature to the catalytic bed must be at least 600 degrees F during normal operation. Startup of a press shall only occur if the inlet temperature of the catalytic oxidizer is at least 550 degrees F.

Parameters are as established during the last stack test.

Condition 1-17: Applicable Federal Requirement: 40CFR 64
The Compliance Certification applies to:

Emission Unit: U-CRTOS
Emission Unit: U-PRESS

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 10 percent or greater for any consecutive six-minute period from any emission source subject to 6NYCRR Part 234 and the Department reserves the right to conduct a Method 9

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

- (a) exhaust gas temperature of all incinerators;
- (b) temperature rise across catalytic incinerator bed;
- (c) breakthrough of volatile organic compounds on a carbon adsorption unit; and
- (d) any other continuous monitoring or recording device required by the commissioner.

Condition 1-19: Applicable Federal Requirement: 6NYCRR 234.6

Item 1-19.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-CRTOS

Monitoring Description:

The following work practices are prohibited:

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

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

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

Condition 1-20 Applicable Federal Requirement: 6NYCRR 234.4(c)

This Condition applies to: Emission Unit: U-PRESS

If an air cleaning device is used, continuous monitors of the following parameters shall be installed, periodically calibrated and operated at all times that the associated control equipment is operating:

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

- (a) exhaust gas temperature of all incinerators;
- (b) temperature rise across catalytic incinerator bed;
- (c) breakthrough of volatile organic compounds on a carbon adsorption unit; and
- (d) any other continuous monitoring or recording device required by the commissioner.

Condition 1-21: Applicable Federal Requirement: 6NYCRR 234.6

The Compliance Certification activity will be performed for:

Emission Unit: U-PRESS

Monitoring Description:

The following work practices are prohibited:

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

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

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

Condition 19: Applicable Federal Requirement: 6NYCRR 212.6(a)

The Compliance Certification activity will be performed for:

Emission Unit: U-TRIMS

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-4115-00011/00055 Renewal Number: 1 Modification Number: 2



10/02/2006

Monitoring Description:

The Permittee shall visually inspect each trim collection system emission point weekly and keep a permanent record of the date and time of the inspection and any observed emissions. If visible emissions are observed, the cyclone discharge shall be closed and the exhaust air shall be discharged through the baghouse for that emission source.

The Permittee shall calibrate, operate and maintain a continuous monitoring system for differential pressure across each of the trim collection baghouses. This continuous monitoring system shall alarm the equipment operators when an equipment malfunction is detected.