New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 9-1430-00213/00110 Renewal Number: 1 **05/29/2007**

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

Owner/Firm
Name: QUEBECOR WORLD BUFFALO INC
Address: 2475 GEORGE URBAN BLVD
DEPEW, NY 14043-2019, USA
Owner Classification: Corporation/Partnership

Permit Contacts
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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.

Summary Description of Proposed Project
Application for renewal of Air Title V Facility.

Attainment Status
QUEBECOR WORLD BUFFALO INC is located in the town of CHEEKTOWAGA in the county of ERIE.
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
Situated on 69 acres of property, the facility has approximately 850,000 sq.ft. of floor space housing six rotogravure presses, eight offset presses, and six flexographic presses. Operations supporting the printed product are the prepress imaging, cylinder engraving, binding lines. Quebecor distribution services operates in a 78,000 sq.ft. section of the main building. 160,000 sq.ft. of the facility is dedicated to paper warehouse and storage. Employment levels are currently at about 1000 persons in a 24 hour, three shift and seven days a week operation. The plant produces approximately 20 million paperback books, 8 million magazines, and 5 million tabloid size circulars per month.

The review of this permit during the renewal process identified both redundant and unnecessary conditions. Conditions were removed or reworded in an effort to make the renewed permit more succinct. No physical changes occurred at the facility to necessitate permit modification.

Permit Structure and Description of Operations
The Title V permit for QUEBECOR WORLD BUFFALO INC 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 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.

QUEBECOR WORLD BUFFALO INC is defined by the following emission unit(s):
Emission unit EG0001 - As indicated on the process flow diagram presented in the permit application, emission unit E-G0001 consists of eight book bindery trimmers identified as TR401, TR411, TR421, TR431, TR441, TR461, TR471, and TR481. Each trimmer has pickup points ducted to one of four cyclones located on the roof of the main building. The exhaust from the cyclones vents to one of five baghouses that discharge air back into the main building. The baghouses are identified as NWBH, SCBH, HOGBH, DUST1, and DUST2. Dust collector fans pick up dust at the book bindery trimmers and discharge the dust to bins which feed the dust into the bales of paper waste.

Emission unit E-G0001 also includes three inserter trimmers identified as TR332, TR334, and TR338. The trim waste is ducted to a cyclone, identifed as emission point 00003, which exhausts to the atmosphere.

Additionally, this emission unit includes a hogger which has a stand alone cyclone/baler for paper waste fed into a hopper at the hogger. The baghouse associated with this emission unit discharges into the Main Building and is identified as emission point 00004.
Emission unit EG0001 is associated with the following emission points (EP):
00001, 00002, 00003, 00004
It is further defined by the following process(es):
Process: 01A is located at Building MAIN - Emission unit E-G0001, Process 01A is the process where bound books are stacked and cut for squareness. The paper trimmings are collected from five pickup points from each of the eight trimmers and two inserter machines. The paper trimmings are vacuumed into the cyclone/baler and formed into bales for recycling. The particulate emissions are ducted to the atmosphere after passing through cyclones or to baghouses which vent back into the main building.

Emission unit EG0002 - Emission unit E-G0002 consists of nine (9) offset, coldset lithographic printing presses and one (1) offset, heatset press. Lithography is a planeographic method in which the image and nonimage areas are on the same plane. The image plate is chemically modified into a hydrophobic, ink-receptive, image area and a hydrophillic, water-loving, nonimage area. Image and nonimage areas remain electrostatically distinct because of the presence of a fountain solution. The fountain solution adheres to the nonimage area while the ink adheres to the image area. The term offset refers to the process where the image is offset or transferred from the plate cylinder to an intermediate blanket cylinder before being transferred to the substrate.
Emission unit EG0002 is associated with the following emission points (EP):
00078
It is further defined by the following process(es):
Process: 02A is located at Building MAIN - Emission unit E-G0002, Process 02A includes six offset lithographic printing presses which print on paper substrates utilizing cold set inks. The nonheat-set or cold-set printing process is distinguished by its unique ink and paper requirements. Nonheat-set inks are semifluid materials whose function depends on the rapid absorption of the liquid component by the surface of the paper. The capillary action of the paper surface draws the liquid into the paper surface and sets the ink. This process does not require the application of heat to cure the resin or evaporate the liquid component. Since most of the materials are retained in the printed sheet, emissions during press operation are minimal.

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

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

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

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

(4) Press EQ104 is a non-heat set, sheet fed, offset press. This press has no direct emission points to the outside atmosphere.

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

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

direct emission points to the outside atmosphere.

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

The offset, heatset press was installed and operated before September 1, 1988 and is required to utilize a fountain solution containing less than 15 percent VOC by weight. Press EQ200 is a heat set, web fed, offset press. This press has five double printing units for printing one color on each side of the web. The ink is dried onto the web as it passes through a gas fired dryer. Although press EQ200 controls VOC emissions by limiting the amount of VOC in the fountain solution, additional control of VOC emissions is maintained through the operation and maintenance of a catalytic afterburner.

Emission unit EG0003 - Emission unit E-G0003 includes three dual fuel package boilers identified as emission sources EQ063, EQ064, and EQ065. Emission sources EQ063, EQ064, and EQ065 each have a maximum rated heat input capacity of 25 mmBtu/hr. The three boilers are each capable of firing fuel oil (no. 4, 5, or 6), and natural gas. Emission sources EQ064 and EQ065 were constructed in the year 1961. Emission source EQ065 was constructed in the year 1979. As such, these boilers are not subject to 40CFR60 Subpart Dc. The boilers are used to provide the gravure printing process with steam for ink drying and room/web humidification. In addition, the steam is utilized for building heat. Condensate water decanted from the solvent recovery system is used in the boilers for steam generation.
Emission unit EG0003 is associated with the following emission points (EP):
00063, 00064, 00065
It is further defined by the following process(es):
Process: 03A is located at Building BOILER - Emission unit E-G0003, Process 03A, consists of three boilers which combust No. 4, 5, or 6 fuel oil to produce steam.
Process: 03B is located at Building BOILER - Emission unit E-G0003, Process 03B, consists of three boilers which combust natural gas to produce steam.

Emission unit EG0004 - Emission unit E-G0004 contains six rotogravure printing presses and three carbon adsorption units. Gravure printing is a type of printing in which the image area is etched or engraved relative to the surface of the image plate or cylinder. The image area consists of small, recessed cells etched into a copper wrap around a plate. The copper layer is protected from wear by a thin electroplated layer of chromium. As the image cylinder rotates in a bath of ink, ink is picked up in the engraved image area and any excess is removed from the non-image area of the plate by a doctor blade. Ink is transferred from the etched wells in the image area directly to the substrate when the substrate is pressed against the image plate by a rubber covered impression roller. Each printing station is followed by a high-volume air dryer, before the next ink is applied. Gravure inks have to be highly fluid with a low viscosity and fast drying. The ink in the press fountains can contain as much as 75% solvent by weight. Most of the solvents are evaporated in the press dryers and sent to a solvent recovery system for reclaiming.

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

The existing six rotogravure presses are identified as emission sources EQ210, EQ211, EQ212, EQ214, EQ217, and EQ218. The three carbon adsorption units are identified as CT068, CT071, and CT075. Emission source CT068 is more commonly referred to as the RD solvent recovery system. The RD solvent recovery system is a three carbon bed system primarily used to recover the solvent laden air (SLA) captured from rotogravure press 211. Emission source CT071 is more commonly referred to as the NE solvent recovery system. The NE system is a five carbon bed system used primarily to recover SLA captured from presses 217 and 218. Emission source CT075 is more commonly referred to as the Dayton solvent recovery system. The Dayton system is a four horizontal carbon bed system primarily used to recover the SLA captured from rotogravure presses 210, 212, and 214. Even though certain presses are generally directed to certain recovery systems, Quebecor does have the flexibility and capability to direct the captured SLA to any of the three solvent recovery systems. As such, the three systems each interact together and are viewed as a single total system.
Emission unit EG0004 is associated with the following emission points (EP):
0068A, 0068B, 0068C, 0071A, 0071B, 0071C, 0071D, 0071E, 0075A, 0075B, 0075C, 0075D, 0075E
It is further defined by the following process(es):
Process: 04A is located at Building MAIN - Emission unit E-G0004, Process 04A, consists of printing on a paper substrate via six rotogravure presses. One of the existing presses, identified as EQ214, was constructed after October 28, 1980 and, thus, is subject to 40CFR60 Subpart QQ. The remaining five presses were each constructed prior to October 28, 1980 and, thus, are not subject to 40CFR60 Subpart QQ. Instead, the remaining five presses are applicable to a less stringent regulation, 6NYCRR Part 234. However, due to the interconnection during the operation of the six presses and the three solvent recovery systems, Quebecor has elected to continue to maintain the higher standard for all six presses and make all the rotogravure presses comply with 40CFR60 Subpart QQ.

Emission unit EG0005 - Emission unit E-G0005 consists of two hard chromium electroplating tanks with a maximum cumulative potential rectifier capacity of greater than 60 million amp-hr per year. Pursuant to 40CFR63.342(c)(2)(i), Quebecor has limited the rectifier capacity to below 60 million amp-hr/yr.
Emission unit EG0005 is associated with the following emission points (EP):
00085, 00089, CHR03
It is further defined by the following process(es):
Process: 05A is located at Building MAIN - Emission unit E-G0005, Process 05A, is a hard chromium electroplating process where engraved copper plates are plated with 3 microns of chromium. The chromium plated, copper plates are used on the gravure cylinders for production printing. The chrome

plating bath utilizes a fume suppressant to reduce misting. In addition, a plate and baffle mist eliminator is used in the exhaust stream.

Emission unit EG0006 - Emission unit E-G0006 consists of eight (8) book binders with hot melt glue pots for attaching the covers to paperback books. Binders EQ430 and EQ460 have open glue pots with stack emissions. Binders EQ400, EQ420, EQ410, EQ440, EQ470, and EQ480 have closed glue pots with no stack emissions.
Emission unit EG0006 is associated with the following emission points (EP):
00037, 00066, 00067
It is further defined by the following process(es):
Process: 06A is located at Building MAIN - Emission unit E-G0006, Process 06A, consists of melting glue beads and application of the melted glue to the book binder.
Process: 06B is located at Building MAIN - Emission unit E-G0006, Process 06B, consists of applying stain to book edges using a staining booth.

Emission unit EG0007 - Emission unit E-G0007 consists of three horizontal carbon steel solvent tanks, each with a maximum capacity of 9908 gallons. The material contained in the tanks is recovered solvent from the solvent recovery system. Additionally, there is one 9908 gallon capacity storage tank which is temporarily out of service. The tanks are located indoors in a secondary containment vault. The tanks do not directly vent outdoors, but do have emergency relief vents associated with them. The four - 9908 gallon capacity carbon steel solvent storage tanks, are not subject to the requirements of 6NYCRR Part 229.3(g) and 6NYCRR Part 229.3(e)(2)(iv) since the tanks are horizontal volatile organic liquid storage tanks, as specified in 6NYCRR Part 229.3(f)(4). In addition, the tanks are not subject to 40CFR60 Subpart Kb, since the capacity is less than 40 cubic meters. As such, this emission unit has no associated conditions in the permit.
It is further defined by the following process(es):
Process: 07A is located at Building MAIN - Emission unit E-G0007, Process 07A, consists of the storage of recovered solvent in three - 10,000 gallon capacity horizontal storage tanks. These storage tanks are identified as TAK6A, TANK7, and TANK8. The source identified as TK14A is a 10,000 gallon storage tank which is temporarily out of service.

Emission unit EG0008 - Emission unit E-G0008 includes eight (8) flexographic printing presses. Flexography is rotary web letterpress printing. It is the application of words or pictures to a substrate by means of a relief technique in which the image area is raised above the non-image area. Image plates are mounted to cylinders with adhesives. Ink is applied to these image carriers which are made of rubber or other elastomeric material. The ink image is then transferred from the flexible plate to the substrate. These presses use a cold-set, isoparaphinic (wax) solvent based ink and are capable of printing one color on a newsprint web.
It is further defined by the following process(es):
Process: 08A is located at Building MAIN - Emission unit E-G0008, Process 08A, consists of printing on a paper substrate utilizing flexographic presses.

Emission unit EG0009 - Emission unit E-G0009 contains nine ink jet printing operations which print identifying information onto cardboard boxes. There are no associated emission points with these

sources.
It is further defined by the following process(es):
Process: 09A is located at Building MAIN - Emission unit E-G0009, Process 09A, includes ink jet printing of identifying information onto cardboard boxes, or books.

Title V/Major Source Status
QUEBECOR WORLD BUFFALO INC is subject to Title V requirements. This determination is based on the following information:
The Quebecor World Buffalo Inc. facility is a major source of air contaminants and is subject to the Title V permitting requirements. The facility has potential-to-emit emissions of the following contaminants greater than the major source thresholds: total Hazardous Air Pollutants (HAP), individual HAPS - toluene and xylene, Particulates, Oxides of Nitrogen (NOx), Sulfur Dioxide (SO2), and Volatile Organic Compounds (VOC).

Program Applicability
The following chart summarizes the applicability of QUEBECOR WORLD BUFFALO INC 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)	YES
NSPS	YES
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 (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

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
2754	COMMERCIAL PRINTING, GRAVURE
2759	COMMERCIAL PRINTING, NEC
9999	NONCLASSIFIABLE ESTABLISHMENTS

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
1-03-006-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-02-004-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL 10-100MMBTU/HR **
3-09-010-06	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - ELECTROPLATING OPERATIONS FABRICATED METALS-ELECTROPLATING-ENTIRE PROCESS-CHROME
4-07-158-12	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FLOATING ROOF TANK - ALCOHOLS FLOAT ROOF TANKS:ALCOHOLS:ISOPROPANOL:WORKING LOSS
4-05-005-11	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Gravure - 2754
4-05-004-01	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Lithographic - 2752
4-05-004-11	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL

	Lithographic - 2752
4-05-003-01	PRINTING/PUBLISHING
	PRINTING/PUBLISHING - GENERAL
	PRINTING - FLEXOGRAPHIC
4-05-004-31	PRINTING/PUBLISHING
	PRINTING/PUBLISHING - GENERAL
	PRINTING/PUBLISHING:OFFSET LITHOGRAPHY:NONHEATED
	LITHOGRAPHIC INKS
3-07-012-01	PULP & PAPER AND WOOD PRODUCTS
	PULP & PAPER & WOOD - MISCELLANEOUS PAPER
	PROCESSES
	MISCELLANEOUS PAPER PROCESSES - CYCLONES
3-07-007-27	PULP & PAPER AND WOOD PRODUCTS
	PULP & PAPER & WOOD - PLYWOOD/PARTICLEBOARD OPERATIONS
	WOOD PRODUCTS:PLYWOOD OPERATIONS: VENEER LAYING AND GLUE
	SPREADING
4-02-013-01	SURFACE COATING OPERATIONS
	SURFACE COATING OPERATIONS - PAPER COATING
	Coating Operation

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.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000098-82-8	BENZENE, (1-METHYLETHYL)(HAP)		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
007738-94-5	CHROMIC ACID(HAP)		> 0 but < 10 tpy
007440-47-3	CHROMIUM(HAP)		> 0 but < 10 tpy
000111-46-6	ETHANOL, 2,2'-OXYBIS-		> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE(HAP)		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 250 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 100 tpy but < 250 tpy

0NY075-00-0	PARTICULATES	>= 250 tpy
000074-98-6	PROPANE	
007446-09-5	SULFUR DIOXIDE	>= 250 tpy
000108-88-3	TOLUENE(HAP)	>= 10 tpy
0NY998-00-0	VOC	>= 250 tpy
001330-20-7	XYLENE, M, O & P MIXT.(HAP)	>= 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 proof.

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

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

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

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part

201-6.3(a)(4)
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: **Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: **Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: **Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: **Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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

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

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

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

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

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

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

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

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

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

i. If additional applicable requirements under the Act become

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

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

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

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

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

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

Item L: **Permit Exclusion - ECL 19-0305**

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

Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: **Federally Enforceable Requirements - 40 CFR 70.6(b)**
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.
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 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	71
E-G0004	40CFR 60-A.11(d)	General provisions - compliance with standards and maintenance	45

		requirements	
FACILITY	40CFR 60-A.4	General provisions - Address	30
E-G0004	40CFR 60-A.7(b)	Notification and Recordkeeping	44
FACILITY	40CFR 60-QQ.434(a)	publication rotogravure printing - monitoring of operations and recordkeeping	31
E-G0004	40CFR 60-QQ.435	Graphic arts industry	46
FACILITY	40CFR 63-A.6(e)(3)	Startup, Shutdown and Malfunction Plan	32
E-G0003	40CFR 63-DDDDD.7506(b)	Industrial/Commercial/Institutional Boiler NESHAP - Boilers subject only to initial notification provisions	42
E-G0008	40CFR 63-KK.821(b)(2)	Printing and Publishing NESHAP-designation of affected sources	70
E-G0004	40CFR 63-KK.823	Printing and Publishing NESHAP-standard: general	47
E-G0004	40CFR 63-KK.824(b)(1)(i)	Printing and publishing NESHAP standard: publication rotogravure printing	48
E-G0004	40CFR 63-KK.827(a)(3)	Printing and publishing NESHAP- performance test methods	49
E-G0004	40CFR 63-KK.827(b)(1)	Printing and publishing NESHAP- performance test methods	50
E-G0004	40CFR 63-KK.829(b)	Printing and Publishing NESHAP- Recordkeeping	51
E-G0004	40CFR 63-KK.829(c)	Printing and Publishing NESHAP- Recordkeeping	52
E-G0004	40CFR 63-KK.830(b)(5)	Printing and Publishing NESHAP- Reporting requirements	53
E-G0005	40CFR 63-N.340(b)	Subpart N - Chromium Electroplating NESHAP	56
E-G0005	40CFR 63-N.342(b)(1)	Subpart N - Standards	57
E-G0005	40CFR 63-N.342(c)(3)	Chrome Electroplating NESHAP - Standards for Hard Chromium Electroplating	58
E-G0005	40CFR 63-N.342(f)	Subpart N - Standards	59
E-G0005/-/05A/CHR03	40CFR 63-N.343(c)(1)	Subpart N - Compliance Provisions & Monitoring	64
E-G0005/-/05A/CHR04	40CFR 63-N.343(c)(1)	Subpart N - Compliance Provisions & Monitoring	65
E-G0005	40CFR 63-N.343(c)(5)		60
E-G0005	40CFR 63-N.344(d)(1)	Subpart N - Performance test requirements and test methods	61
E-G0005	40CFR 63-N.346(b)	Subpart N - Recordkeeping requirements	62
E-G0005	40CFR 63-N.347(g)(1)	Subpart N - Reporting requirements	63
FACILITY	40CFR 68	Chemical accident prevention provisions	22

FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	23
FACILITY	6NYCRR 200.3	False Statement.	24
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	10
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	72
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	12
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	13, 14
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	15
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	25, 33, 34
FACILITY	6NYCRR 201-6.5(a)(4)	General conditions	16
FACILITY	6NYCRR 201-6.5(a)(7)	General conditions	
Fees 2			
FACILITY	6NYCRR 201-6.5(a)(8)	General conditions	17
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5(c)(2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5(d)(5)	Compliance schedules	18
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	6
FACILITY	6NYCRR 201-6.5(f)(6)	Off Permit Changes	19
FACILITY	6NYCRR 202-1.1	Required emissions tests.	20
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	73
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	21
E-G0006/-/06A	6NYCRR 212.10(c)(1)	NOx and VOC RACT required at major facilities	66
E-G0005	6NYCRR 212.4(b)	New processes	55
FACILITY	6NYCRR 212.6(a)	General Process Emission Sources - opacity of emissions limited	26
FACILITY	6NYCRR 215	Open Fires	9
E-G0003	6NYCRR 225-1.2(a)(2)	Sulfur in Fuel Limitations Post 12/31/87.	38

E-G0003	6NYCRR 225-1.8(a)	Reports, sampling and analysis.	39
E-G0003	6NYCRR 227-1.3(a)	Smoke Emission Limitations.	40
E-G0003	6NYCRR 227-2.4(d)	RACT for Oxides of Nitrogen - small boilers.	41
E-G0006/-/06B	6NYCRR 228.10	Handling, storage and disposal of VOCs	67
E-G0006/-/06B	6NYCRR 228.7	Table 1	68
FACILITY	6NYCRR 234.1(g)	"Once in always in"	27
E-G0008	6NYCRR 234.3(a)(1)	Control requirements	69
E-G0004/-/04A/EQ210	6NYCRR 234.3(a)(3)(i)	control requirements - publication rotogravure	54
E-G0002/-/02B	6NYCRR 234.3(b)(1)	control requirements - offset lithographic printing	36
E-G0002/-/02A	6NYCRR 234.3(b)(2)	control requirements - offset lithographic printing	35
FACILITY	6NYCRR 234.3(e)	Graphic Arts - control requirements - opacity	28
E-G0002/-/02B/EQ200	6NYCRR 234.4(c)(2)	temperature rise across bed	37
E-G0004	6NYCRR 234.4(c)(3)	carbon breakthrough	43
FACILITY	6NYCRR 234.6	Handling, storage and disposal of volatile organic compounds (VOC).	29

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 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 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.

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.

40 CFR Part 68.
This Part lists the regulated substances and there 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, QUEBECOR WORLD BUFFALO INC has been determined to be subject to the following regulations:

40CFR 60-A.11 (d)
This regulation specifies the type of opacity monitoring requirements in relation to compliance with the standards and maintenance requirements.

40CFR 60-A.4
This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40CFR 60-A.7 (b)
This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40CFR 60-QQ.434 (a)
After completion of the required performance test, the operator of any affected publication rotogravure printing facility using waterborne ink systems or solvent-borne ink systems with solvent recovery shall record the amount of solvent and water used, solvent recovered and estimated emission percentage over the performance averaging period (either one month or 4 weeks).

40CFR 60-QQ.435
This rule outlines test methods and procedures.

40CFR 63-A.6 (e) (3)
Paragraph 63.6(e)(3) requires a startup, shutdown, and malfunction (SSM) plan for MACT-affected sources and that the plan be followed.

40CFR 63-DDDDD.7506 (b)
This condition lists the types of boilers that are exempt from all parts of this rule except that these types of boilers need to have initial notifications submitted.

40CFR 63-KK.821 (b) (2)
This rule lists excluded sources.

40CFR 63-KK.823
This rule provides a cross reference to the applicable provisions of 40CFR63 Subpart A.

40CFR 63-KK.824 (b) (1) (i)
This rule contains the requirements for solvent recovery system overall organic HAP control efficiency.

40CFR 63-KK.827 (a) (3)
This rules contains an exemption from performance testing for solvent recovery devices.

40CFR 63-KK.827 (b) (1)
This rule describes the required determination of the organic HAP content for publication rotogravure sources.

40CFR 63-KK.829 (b)
This rule specifies records to be kept by facilities subject to 40CFR63 Subpart KK.

40CFR 63-KK.829 (c)
This rule specifies records to be kept by facilities using a solvent recovery device and performing a liquid-liquid material balance monthly to demonstrate compliance with 40CFR63 Subpart KK.

40CFR 63-KK.830 (b) (5)
This rule contains reporting requirements for startup, shutdown, and malfunctions.

40CFR 63-N.340 (b)
This requires compliance with the general provisions which contains requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices .

40CFR 63-N.342 (b) (1)
This has requirements for tank operation, start up and shut down as well as work practice standards during malfunctions.

40CFR 63-N.342 (c) (3)
This rule contains a method for a facility to be classified as a small chromium electroplating facility based on actual hours of operation.

40CFR 63-N.342 (f)
This rule mandates operation and maintenance practices.

40CFR 63-N.343 (c) (1)
This rule describes required monitoring to demonstrate continued compliance for composite mesh pad systems.

40CFR 63-N.343 (c) (5)
This rule describes required monitoring to demonstrate continued compliance for fume suppressant systems.

40CFR 63-N.344 (d) (1)
This rule allows for establishing site-specific operating parameter values.

40CFR 63-N.346 (b)
This rule outlines the recordkeeping requirements.

40CFR 63-N.347 (g) (1)
This requires when, where and the content of compliance status reports and exceedance reports.

6NYCRR 200 .3
No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

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 212 .10 (c) (1)
Reasonably available control technology compliance plans for major facilities. The compliance plan must identify reasonably available control technology (RACT) for each emission point which emits nitrogen oxides for major nitrogen oxide facilities or volatile organic compounds for major volatile organic compound facilities. The compliance plan must identify the emission points which do not employ reasonably available control technology (RACT), and a schedule for implementation of RACT must be included in the plan.

6NYCRR 212 .4 (b)
212.4(b) establishes a limit on gas and liquid particulates.

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 225-1.2 (a) (2)
This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.8 (a)
Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned,

and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years

6NYCRR 227-1.3 (a)
This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-2.4 (d)
This rule specifies that the reasonably available control technology (RACT) requirement for small boilers (< or = 50 million BTUs/hr) at Title V facilities consists of an annual tune-up.

6NYCRR 228 .10
This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6NYCRR 228 .7
Table 1 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

6NYCRR 234 .1 (g)
Once a printing process at a facility is subject to the requirements of Part 234, it always will be subject to the rule even if the emissions of volatile organic compounds from the facility are less than the applicability limits.

6NYCRR 234 .3 (a) (1)
Any owner or operator of a packaging rotogravure, publication rotogravure, or flexographic printing process employing ink containing volatile organic compounds shall ensure that the volatile fraction of ink, as it is applied to the substrate, contains 25.0 percent by volume or less or volatile organic compounds and 75.0 percent by volume of nonreactive volatiles. The formulas used to calculate the concentration of volatile organic compounds in an ink are set forth in Section 234.3(a)(1).

6NYCRR 234 .3 (a) (3) (i)
The capture system and air cleaning device must be designed and operated such that the following minimum overall removal efficiencies of volatile organic compounds is achieved:

- publication rotogravure processes - 75%

The overall removal efficiency is determined by (1) testing the capture efficiency of the removal system; and (2) testing the destruction efficiency. The testing methods used to determine the overall removal efficiency must be approved in advance by the DEC.

6NYCRR 234 .3 (b) (1)
The facility began operation prior to September 1, 1988. An offset lithographic printing process is used at the facility which is subject to Part 234, and which uses fountain solutions containing volatile organic

compounds containing 15% by weight or less of volatile organic compounds.

In addition, an air cleaning device must be used in which 90% of the volatile organic compounds are removed from the exhaust stream.

6NYCRR 234 .3 (b) (2)
The facility began operation on or after September 1, 1988. An offset lithographic printing process is used at the facility which is subject to Part 234, and which uses fountain solutions containing volatile organic compounds containing 10% by weight or less of volatile organic compounds.

In addition, an air cleaning device must be used in which 90% of the volatile organic compounds are removed from the exhaust stream.

6NYCRR 234 .3 (e)
The emissions to the outdoor atmosphere may not exceed an average opacity greater than 10% for any consecutive six-minute period from any emission source subject to Part 234.

6NYCRR 234 .4 (c) (2)
The temperature rise across the catalytic bed must be continuously monitored.

6NYCRR 234 .4 (c) (3)
A monitor must be installed and operated continuously to order to detect the breakthrough of volatile organic compounds (VOCs) through the carbon adsorption system used to control VOC emissions from printing processes. When breakthrough occurs, the carbon adsorption systems must be stripped (cleaned) to recover the captured VOCs before it can be placed back into service.

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 QUEBECOR WORLD BUFFALO INC:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	monitoring of process or control device parameters as surrogate	31
E-G0004	record keeping/maintenance procedures	46
FACILITY	record keeping/maintenance procedures	32

E-G0003	record keeping/maintenance procedures	42
E-G0008	work practice involving specific operations	70
E-G0004	monitoring of process or control device parameters as surrogate	48
E-G0004	record keeping/maintenance procedures	50
E-G0004	record keeping/maintenance procedures	51
E-G0004	record keeping/maintenance procedures	52
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Basis for Monitoring

Most of the monitoring requirements contained in this permit are based on specific monitoring methods and observations as prescribed in the applicable rules. Facility specific monitoring conditions were written to assure that reliable information is obtained representing the facility's compliance status for the following issues:

Condition #14 requires the tracking of the number of hours that emergency engines are used to show that the exempt level of no more than 500 hours per year is not exceeded.

Condition #6 is a standard condition which details recordkeeping and reporting requirements specific to Title V permits.

Condition #55 states that demonstration of compliance with 40CFR63 Subpart N, National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Anodizing Tanks, satisfies the emission requirements of Part 212.4.

Condition #26 contains the opacity monitoring requirements for sources in emission units E-G0001, E-G0005, & E-G0006. Quebecor is required to conduct observations of visible emissions from the facility on a daily basis. Opacity is limited to no more than 20%.

Condition #66 states that Quebecor has demonstrated a RACT non-applicability for the process which involves melting of glue beads and application of the melted glue to the book binders. Quebecor will reevaluate the RACT applicability if a new glue formulation with a greater VOC content is used.

Condition #38 restricts the purchase and use by Quebecor of fuel oil with a sulfur content greater than 1.5 percent.

Condition #39 requires Quebecor to retain fuel oil supplier certifications for each shipment of oil received to document compliance with the 1.5% sulfur content limit of Condition #38.

Condition #40 contains the opacity monitoring requirements for the boilers in emission units E-G0003. Quebecor is required to conduct observations of visible emissions from the facility on a daily basis. Opacity is limited to no more than 20%.

Condition #41 requires annual boiler tune-ups.

Condition #68 states the compliant coating standard for paper coating lines as a maximum of 2.9 pounds of VOC (minus water and excluded VOC) per gallon of coating as applied.

Condition #67 states many housekeeping requirements within the coating line, such as only using closed containers to store or dispose of spent surface coatings, to minimize the fugitive emission of VOCs.

Condition #27 states the "Once In, Always In" provision of Part 234.

Condition #69 requires the Quebecor to demonstrate through sample test data, required calculations, and manufacturer certifications, that the volatile fraction of the ink used in the flexographic presses, as it is applied to the substrate, contains 25% by volume or less of VOC and 75% by volume or more of nonreactive volatiles.

Condition #54 states that since one press is subject to the more strict requirements of 40CFR60 Subpart QQ which requires an overall VOC reduction of 84% compared to the overall VOC reduction of 75% required by Part 234, Quebecor has elected to maintain compliance with the higher VOC reduction for all

rotogravure presses.

Condition #36 requires compliance with a maximum allowable 15 percent by weight or less of volatile organic compounds content in the fountain solution for press EQ200 to be demonstrated through dilution calculation records and sample test results.

Condition #35 requires compliance with a maximum allowable 10 percent by weight or less of volatile organic compounds (VOC) content of the fountain solution for presses EQ033, EQ038, EQ100, EQ104, and EQ125 to be demonstrated through dilution calculation records and sample test results.

Condition #28 contains the opacity monitoring requirements for the sources in emission units E-G0002, E-G0004, & E-G0008. Quebecor is required to conduct observations of visible emissions from the facility on a daily basis. Opacity is limited to no more than 10%.

Condition #37 requires that the VOC-laden gas stream from an operating Press 200 will be routed to a properly operating catalytic afterburner. This is accomplished by the interlocked afterburner and press system, which only allows operation of the press if the catalyst bed temperature is at least 700 degrees F. This assures that the VOC-laden gas stream from the press in printing mode can not pass through an insufficiently warmed afterburner which would be incapable of a sufficient destruction efficiency.

Condition #43 defines how the carbon beds are operated so that any one bed of the total system never reaches the breakthrough point.

Condition #31 requires the solvent recovery system to provide for an overall reduction in volatile organic compound (VOC) emissions of at least 84%. Compliance is demonstrated on a plant-wide basis for all existing and affected facilities combined.

Condition #46 contains test methods and procedures which are required of publication rotogravure printing presses

Condition #32 requires the development and implementation of a Startup, Shutdown, and Malfunction Plan.

Condition #58 requires recordkeeping to demonstrate that Quebecor meets the criteria to alternatively be considered a small hard chromium electroplating facility.

Condition #59 details the requirements of the work practice standards for the hard chromium electroplating tanks.

Condition #64 defines continued compliance which the performance test standard for the chromium electroplating tank identified as CHR03 as being assured via specific surrogate compliance indicators involving pressure drop across a mesh filter.

Condition #65 defines continued compliance which the performance test standard for the chromium electroplating tank identified as CHR04 as being assured via specific surrogate compliance indicators involving pressure drop across a mesh filter.

Condition #60 states that Quebecor met the surface tension criteria and are monitoring surface tension voluntarily on a monthly basis as an additional compliance indicator.

Condition #61states that Quebecor chose to limit the number of rotogravure cylinders processed through the plating tanks during the performance tests. The facility is limited to electroplating a maximum of two (2) rotogravure cylinders per hour in each individual tank.

Condition #62 requires recordkeeping of inspections, maintenance and testing of the hard chromium electroplating tanks.

Condition #63 requires the submission of a summary report to the USEPA Administrator to document the ongoing compliance status of the chromium electroplating tanks.

Condition #70 states that Quebecor has chosen to limit use of organic HAP per wide-web flexographic press per month to no more than 400 kilograms to comply with the criteria stated in 40CFR 63.821(b)(2). This allows the wide-web flexographic presses to be subject only to compliance demonstration and initial notification requirements.

Condition #48 states that Quebecor utilizes a solvent recovery system to capture and recover hazardous air pollutant (HAP) emissions from each of the publication rotogravure printing processes at the facility. The solvent recovery system provides for an overall control of at least 92% of organic HAP used. Quebecor performs a liquid-to-liquid material balance for each month to demonstrate continued compliance.

Condition #50 states that Quebecor has elected to rely on formulation data provided by the manufacturer to determine the organic HAP weight-fraction of each ink, coating, solvent, and other material used in the publication rotogravure process. The formulation data is provided on a Certified Product Data Sheet (CPDS) from the manufacturer.

Condition #51 requires Quebecor to maintain records on a monthly basis, in accordance with the requirements of 40CFR63.10(b)(1).

Condition #52 defines additional records which must be maintained by Quebecor to document compliance with 40CFR 63 Subpart KK.

Condition #53 requires Quebecor, since the facility is subject to 40CFR63 Subpart KK and is using a control device to comply, to submit start-up, shutdown, and malfunction reports as specified in Section 63.10(d)(5).

Condition #42 states that the boilers are subject to 40CFR63 Subpart DDDDD, Industrial, Commercial and Institutional Boilers, and are considered “existing large liquid fuel units”. This boiler category is subject to only the initial notification requirements in 40CFR63 Subpart A, §63.9(b).