PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1402-00795/00003
Effective Date: 07/06/2015 Expiration Date: 07/05/2025

Permit Issued To:BUFFALO NEWSPRESS INC
P O BOX 648
BUFFALO, NY 14240-0648

Contact: JAMES P BURKE
BUFFALO NEWSPRESS INC
PO BOX 648
BUFFALO, NY 14240-0648
(716) 852-1600

Facility: BUFFALO NEWSPRESS INC
200 BROADWAY
BUFFALO, NY 14204

Description:

AIR STATE FACILITY PERMIT DESCRIPTION
BUFFALO NEWSPRESS, INC.
DEC I.D. NO. 9140200795
RENEWAL 1, MOD 0

Buffalo Newspress, Inc. (Facility) located at 200 Broadway Avenue in Buffalo, New York, operates commercial web offset lithographic printing presses for weekly newspapers, advertising supplements and various publications. The Facility emits volatile organic compounds (VOCs), including hazardous air pollutants (HAPs), which are contained in the inks, fountain solution (used in the printing process), blanket solution (used to clean the presses), developers and cleaners. The facility operates 24 hours per day, 365 days per year. The Standard Industrial Classification Code for Buffalo Newspress is 2752 - Commercial Printing, Lithographic.

All printing operations at Buffalo Newspress are contained in Emission Unit (EU) A-00001. Currently the facility operates six 4-color web offset lithographic printing presses, identified as Emission Source (ES) 00001, ES 00002, ES 00005, ES 00006, ES 00010, and ES 000012. All of these presses can operate with cold-set inks, identified as Process 001 in the Air State Facility (ASF) permit. Cold-set inks have low volatility and dry via oxidation or absorption, resulting in 95% of the ink being retained in the substrate. When cold-set inks are used emissions are fugitive and are exhausted through general ventilation roof vents, identified as Emission Point (EP) 00002, EP 00003, EP 00004 and EP 00005 in the ASF permit. Four of the cold-set presses can also operate with heatset inks. When heatset inks are utilized with these presses, the ink is cured in negative pressure, gas fired, hot air drying ovens where 80% of the VOCs in the heatset inks are

evaporated from the substrate. The VOCs generated in the dryer are exhausted to one of three regenerative thermal oxidizers (RTOs) to control VOC emissions identified in the ASF permit as Emission Source Control (ESC) 00007 (controls ES 00001 and ES 00002), ESC 00009 (controls ES 00010) and ESC 00011 (controls ES 00012). Emissions from the RTOs are exhausted to the ambient air through Emission Point (EP) 00001, EP 00007 and EP 00008, respectively. The operation of the heatset presses and associated dryers, followed by control of dryer emissions by an RTO is identified as Process 002. All RTOs are required to operate at a minimum combustion zone temperature of 1500 degrees Fahrenheit (F), which must be continuously monitored and recorded. The RTO burners are supplemented, as needed, with natural gas to maintain this operating temperature. However the RTOs are mostly fueled by the VOC laden air from the heatset printing process. There is a bypass stack associated with each RTO for emergency purging of natural gas and emergency operation of the heatset presses in accordance with the RTO Preventative Maintenance, Operation and Emergency Shutdown Plan. The dryers associated with the heatset presses are required to operate under negative pressure to ensure 100% capture of emissions from the ink and fountain solution during the heatset printing process. Both Process 001 and Process 002 include ES 00008, the manual cleaning of the presses with a solvent mixture (blanket wash) containing VOCs and HAPs.

This permit renewal includes the addition of ES 00014 to the permit, which consists of a Goss Magnum EP-19146, four unit web offset lithographic printing press and an Advanced Systems Inc. Sahara II Dryer S140881 for use with heatset inks. The dryer is operated under negative pressure. VOC and HAP emissions from the dryer are controlled by a continuously monitored TANN Regenerative Thermal Oxidizer (RTO) TR392C, identified as ESC 00013. The TANN RTO TR392C must be operated at a minimum temperature of 1500 degrees F. Emissions from this RTO are exhausted through EP 00009. The new press can also be operated with cold-set inks. Fugitive emissions from cold-set inks will be exhausted through the general ventilation roof vents. Since this change met the criteria of 6NYCRR201-5.4(e), the installation and start-up of ES 00014, ESC 00013 and EP 00009 commenced during August 2014 without modifying the ASF permit.

Since November 3, 2000, Buffalo Newspress has operated under an Air State Facility (ASF) permit which contains federally-enforceable CAPs on the Facility's annual potential to emit (PTE) VOCs, total HAP and individual HAPs. These CAPs were accepted to limit annual PTEs to below the applicability thresholds which would require a Title V permit. The limit on VOC emissions has also allowed Buffalo Newspress to avoid the requirements of 6NYCRR231: New Source Review for New and Modified Facilities. The facility-wide limits that Buffalo Newspress must comply with are 49 tpy VOCs, 24 tpy total HAPs, and 9 tpy individual HAPs. To ensure that the CAPs on VOCs, Total HAPs and individual HAPs are maintained, Buffalo Newspress is required to operate each regenerative thermal oxidizers (RTOs) with a minimum 95% destruction efficiency (DE) to control emissions from the heatset printing processes. In addition, the dryers associated with the heatset presses are required to operate under negative pressure to ensure 100% capture of contaminants emitted from the inks and fountain solution used during the heatset printing process. The lithographic printing operations at Buffalo Newspress are subject to the applicable requirements specified under 6NYCRR234: Graphic Arts. Several monitoring conditions for Part 234 and other requirements in the ASF permit were modified as part of this permit renewal to include ES 00013, ESC 00014 and EP 0009. Monitoring Condition (MC) #2-8 (6NYCRR234.3(b)(1)) and MC # 2-11 (6NYCRR234.4(a)), erroneously added to the ASF permit in REN0, MOD 2, were removed from the permit during this permit renewal. These requirements apply only to facilities that operate heatset presses that have an annual potential to emit VOC of 25 tons per year or more, each or that are located at a

facility that has an annual potential to emit VOC of 50 tons per year or more. Because Buffalo Newspress operates under a federally enforceable CAP on VOCs, their facility-wide annual PTE VOCs is less than 50 tpy. In addition, each heatset press is required under the federally enforceable capping condition in the ASF permit to control emissions at 95% DE with 100% capture of heatset press emissions from ink and fountain solution used during the printing process. An evaluation of the annual PTE VOCs for each heatset press, considering the mandatory control, was conducted during the permit renewal process. Results show that each heatset press or press set has an annual PTE VOCs after control that is less than 25 tpy as follows: ES 00001 and ES 00002, combined @ 19 tpy, ES 00010 @ 10 tpy, ES 00012 @ 11 tpy, ES 00014 @ 5 tpy. Considering this, Buffalo Newspress is neither subject to the control requirements specified in 6NYCRR234.3(b)(1), nor the testing requirements specified in 6NYCRR234.4(a). To date, the only RTO that has been stack tested for DE is the Airex/Adwest RTO (ESC 00009, associated with ES 00010). Results from a July 21, 2010 performance test showed an average DE of 98.8% at 1500 °F. Additional performance testing, including the overall removal efficiency, of this and other RTOs may be required at NYSDEC's discretion.

Buffalo Newspress must operate and maintain all equipment in accordance with manufacturer recommendations/specifications and good engineering practices. The heatset lithographic printing process must also be operated and maintained in accordance with the Regenerative Thermal Oxidizer (RTO) Preventative Maintenance, Operating and Emergency Shutdown Plan contained in Appendix A of the ASF permit. Buffalo Newspress will continue to operate within the limits of their CAPs and comply with the control, monitoring, maintenance, reporting and recordkeeping requirements specified in this ASF permit and Appendices.

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

Permit Administrator: LISA M CZECHOWICZ
NYSDEC - REGION 9
270 MICHIGAN AVE
BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ___ / ___ / _____

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

LIST OF CONDITIONS

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

DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

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

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

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

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

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

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

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

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

Item 3.3:
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:
The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:
Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:BUFFALO NEWSPRESS INC
P O BOX 648
BUFFALO, NY 14240-0648

Facility: BUFFALO NEWSPRESS INC
200 BROADWAY
BUFFALO, NY 14204

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

Permit Effective Date: 07/06/2015 Permit Expiration Date: 07/05/2025

LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS
Facility Level

1 6 NYCRR 200.7: Maintenance of Equipment
2 40CFR 82, Subpart F: Recycling and Emissions Reduction
3 6 NYCRR 200.3: False statement
4 6 NYCRR 200.7: Compliance Demonstration
5 6 NYCRR 201-7.1: Facility Permissible Emissions
*6 6 NYCRR 201-7.1: Capping Monitoring Condition
*7 6 NYCRR 201-7.1: Capping Monitoring Condition
*8 6 NYCRR 201-7.1: Capping Monitoring Condition
*9 6 NYCRR 201-7.1: Capping Monitoring Condition
*10 6 NYCRR 201-7.1: Capping Monitoring Condition
*11 6 NYCRR 201-7.1: Capping Monitoring Condition
12 6 NYCRR 211.1: Air pollution prohibited
13 6 NYCRR 234.1 (c): Once in, always in
14 6 NYCRR 234.3 (c) (1) (ii): Compliance Demonstration
15 6 NYCRR 234.3 (d) (1): Compliance Demonstration
16 6 NYCRR 234.5: Compliance Demonstration
17 6 NYCRR 234.6: Compliance Demonstration
18 6 NYCRR 234.7: Compliance Demonstration
19 6 NYCRR 234.8: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS
Facility Level

20 ECL 19-0301: Contaminant List
21 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
22 6 NYCRR Subpart 201-5: Emission Unit Definition
23 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
24 6 NYCRR 201-5.3 (c): Compliance Demonstration
25 6 NYCRR 211.2: Visible Emissions Limited
Emission Unit Level
26 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
27 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.

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

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

Item A: **Sealing - 6 NYCRR 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

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

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

Item C: **Maintenance of Equipment - 6 NYCRR 200.7**

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

required to operate such device effectively.

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

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

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

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

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item K: **Open Fires Prohibitions - 6 NYCRR 215.2**
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

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.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: **Maintenance of Equipment**

Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 200.7

Item 1.1:
Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 2: Recycling and Emissions Reduction
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:40CFR 82, Subpart F

Item 2.1:
The permittee shall comply with all applicable provisions of 40 CFR Part 82.

Condition 3: False statement
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 200.3

Item 3.1:
No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 4: Compliance Demonstration
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 200.7

Item 4.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: A-00001
Process: 002 Emission Source: 00007

Emission Unit: A-00001
Process: 002 Emission Source: 00009

Emission Unit: A-00001
Process: 002 Emission Source: 00011

Emission Unit: A-00001
Process: 002 Emission Source: 00013

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

Item 4.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Buffalo Newspress operates four Regenerative Thermal Oxidizers (RTOs) (Emission Source Control (ESC) 00007 (Megtec Millennium RTO), ESC 00009 (Airex/Adwest RTO), ESC 00011 (TANN RTO)) and ESC 00013 (TANN RTO 2) to control VOC, total HAP, and individual HAP emissions from five heat-set web offset lithographic printing presses (Emission Source (ES) 00001, ES 00002, ES 00010, ES 00012 and ES 00014). The use of the RTOs allows Buffalo Newspress to comply with control requirements specified in this permit under 6NYCRR201-7.1 to maintain VOC, total HAP, and individual HAP emissions below the federally enforceable, facility-wide annual potential to emit limits set to avoid the requirements of of 6NYCRR201-6, "Title V Facility Permits" and 6NYCRR231, "New Source Review for New and Modified Facilities". The RTOs also allow Buffalo Newspress to avoid the control and testing requirements specified in 6NYCRR234, "Graphic Arts" by limiting the facility wide annual PTE VOCs to less than 50 tpy and subsequently, limiting the annual PTE VOCs to less than 25 tpy for each heatset press. The RTOs also enable Buffalo Newspress to maintain contaminant emissions below NYSDEC's short-term (1-hour) and annual guideline concentrations (SGCs and AGCs) for toxic contaminants and to control nuisance odors in accordance with 6NYCRR211.1, "Air Pollution Prohibited". In addition, the RTOs control the opacity of the stack gases emitted from Emission Points 00001, 00007, 00008 and 00009 to ensure compliance with the opacity limits of less than 10% specified under 6NYCRR234.8 and the opacity limit of less than 20% specified under 6NYCRR211.2 - "Visible emissions limited".

The owner or operator of any facility which uses air pollution control equipment to comply with an emissions cap or any other requirement must operate and maintain the equipment in a manner consistent with good engineering practices. Buffalo Newspress must follow the procedures specified in their Preventative Maintenance, Operating and Emergency Shutdown Plan (Plan), which is included in Appendix A of this Air State Facility permit. Recordkeeping and reporting shall be conducted in accordance with the requirements specified in the Plan. Any changes made to the Preventative Maintenance, Operating and Emergency Shutdown Plan must be approved by NYSDEC prior to implementation. Manufacturer's Operation and Maintenance Manuals shall also be considered part of this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 5: Facility Permissible Emissions
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 5.1:
The sum of emissions from the emission units specified in this permit shall not equal or exceed the following
Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 001330-20-7 Name: XYLENE, M, O & P MIXT.	PTE:	18,000	pounds per year
CAS No: 0NY100-00-0 Name: TOTAL HAP	PTE:	48,000	pounds per year
CAS No: 0NY998-00-0 Name: VOC	PTE:	98,000	pounds per year

Condition 6: Capping Monitoring Condition
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 6.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
6 NYCRR Subpart 231-2

Item 6.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 6.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 6.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an

emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 6.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 6.6:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 6.7:
Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Buffalo Newspress must operate all dryers associated with heatset presses under negative pressure that is sufficient to capture 100% of the VOC emissions generated during the printing process from heatset inks, varnishes and other coatings. The press dryer must operate at negative pressure relative to the surrounding pressroom with the air flow into the dryer.

An annual inspection shall be conducted to verify that the pressure of the dryer is negative and sufficient to capture 100% of the VOCs from the inks, varnishes and other coatings. This may be determined using an air flow direction indicator (e.g. smoke stick, aluminum ribbons), a differential pressure gauge or other device acceptable to the department. The results shall be recorded in a permanently bound logbook or electronically on a secure server with the name of the person verifying the dryer pressure and/or direction of flow, the date, the time of day, the number and locations of readings, and any other pertinent information. The blower associated with the dryer shall be operated and maintained in accordance with manufacturer's specifications and recommendations. Inspection, maintenance, repair and associated purchase records shall be maintained. All records shall be kept onsite for a minimum of five years and shall be available for review upon request by NYSDEC and/or USEPA representatives.

Parameter Monitored: PRESSURE
Lower Permit Limit: 100 percent capture efficiency
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 7: Capping Monitoring Condition
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 7.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
6 NYCRR Subpart 231-2

Item 7.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 7.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 7.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 7.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 7.6:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: A-00001
Process: 002

Regulated Contaminant(s):

CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 0NY100-00-0	TOTAL HAP
CAS No: 0NY998-00-0	VOC

Item 7.7:
Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

If, at any time, the 12-month rolling total for facility-wide emissions of volatile organic compounds (VOCs), total hazardous air pollutants (HAPS) and/or individual HAPs exceeds 45.0 tpy, 22.5 tpy and/or 8.5 tpy, respectively, Buffalo Newspress shall conduct performance tests to verify the overall removal efficiencies of the RTOs. The overall removal efficiency is the total reduction in VOC emissions considering the efficiency of both the capture system and subsequent destruction or removal of these emissions by the control equipment prior to their release into the atmosphere.

Any exceedance of the 45.0 tpy limit for VOCs, the 22.5 tpy limit for total HAPs and/or the 8.5 tpy limit for individual HAPs shall be reported to the Department immediately and a stack test protocol shall be submitted for review within 30 days of the exceedance. The stack test shall be conducted within 30 days of Department approval of the stack test protocol using one of the test methods listed below to measure the VOC concentration of the gas stream at the inlet and outlet of the RTO(s). The efficiency of the capture system must also be determined. A capture system consists of all equipment including, but not limited to, hoods, ducts, fans, booths, ovens, or dryers that contain, collect, and transport air pollutants to control equipment. The VOC content, water content, density, volume of solids and weight of solids of surface coatings and printing inks shall also be determined using analytical methods acceptable to the department, including methods 24 and 24A (as appropriate), of 40 CFR 60. Alternate analytical methods for surface coating and printing ink analysis must be approved by the department and the USEPA. Instead of analytical methods, the department may accept the manufacturer's certification of VOC content of inks, coatings or adhesives, if supported by actual batch records.

Buffalo Newspress shall notify the Department of the scheduled performance test date at least 15 days in advance of testing. A stack test report shall be

submitted to the Department within 60 days of conducting the performance test. The department may require that Buffalo Newspress conduct additional stack tests to verify the overall removal efficiency of an RTO or emission rate(s) of any contaminant(s), even if the source has been previously tested or the limits specified in this monitoring condition have not been exceeded.

Upper Permit Limit: 45 tons per year
Reference Test Method: Method 18, 25 or 25A
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 8: Capping Monitoring Condition
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 8.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
6 NYCRR Subpart 231-2

Item 8.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 8.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 8.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 8.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of

the Act.

Item 8.6:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: A-00001
Process: 002

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

Item 8.7:
Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Buffalo Newspress operates four 4 unit web offset lithographic presses, and one 8 unit web offset lithographic press which utilize heat-set inks (Emission Sources 00001, 00002, 00012, 00014 and 00010, respectively). The printed substrates are cured in negative pressure, gas-fired, hot air drying ovens, which are considered part of the printing process. Volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) evaporated in the dryer associated with ES 00001 and ES 00002 are exhausted to a regenerative thermal oxidizer (RTO), identified as Emission Source Control (ESC) 00007. Volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) evaporated in the dryer associated with ES 00010 are exhausted to another RTO, identified as ESC 00009. Volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) evaporated in the dryer associated with ES 00012 are exhausted to an RTO, identified as ESC 00011. Volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) evaporated in the dryer associated with ES 00014 are exhausted to an RTO, identified as ESC 00013. The minimum required operating temperature for the combustion chamber of each RTO is 1500 degrees Fahrenheit and all of the heatset presses shall be interlocked to shutdown if the combustion chamber temperature drops below 1500 degrees Fahrenheit. The RTO combustion chamber must be preheated to this temperature before commencement of heatset printing. Production records showing the beginning and end times for heatset printing shall be maintained for each heatset press. The combustion chamber temperature must be continuously monitored and recorded to verify compliance with the minimum temperature requirement and to verify compliance with the VOC, individual HAP and total HAP

CAPs. Strip charts and/or electronic data showing continuous monitoring and recording of the combustion chamber operating temperature shall be maintained on-site to verify compliance with the temperature requirement. The continuous temperature monitors shall be installed, calibrated, and operated in accordance with the manufacturer's specifications and recommendations. Calibration, preventative maintenance and repair records for monitoring equipment shall be maintained. All electronic data must be stored securely and backed up on a daily basis.

Any noncompliance shall be addressed immediately and reported to the NYSDEC Region 9 office by telephone during normal business hours (or by e-mail) within 2 business days of the occurrence. Appropriate details regarding any noncompliance with the minimum temperature requirement for the combustion chamber shall be recorded including, but not limited to, the cause, the length of the excursion, corrective action taken, opacity readings, contaminants emitted, and any increases in emissions with corresponding calculations using the equation specified in this permit under 6NYCRR201-7.1 for the RTO operating at less than 1500 degrees Fahrenheit. This information shall be submitted to the NYSDEC Region 9 office as a written report within 30 days of the occurrence and shall be reported in the annual certification.

The RTOs shall be operated and maintained in accordance with the manufacturer's operation and maintenance manuals and the Regenerative Thermal Oxidizer (RTO) Preventative Maintenance, Operating and Emergency Shutdown Plan, which shall be considered part of this permit. Maintenance, repair and purchase records shall be kept on-site to verify maintenance/repair performed.

All required records shall be maintained onsite for a minimum of 5 years and shall be available upon request for NYSDEC and/or USEPA review.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1500 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT DURING STARTUP/SHUTDOWN
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 9: Capping Monitoring Condition
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 9.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

Item 9.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 9.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 9.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 9.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 9.6:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 9.7:
Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Buffalo Newspress has an annual potential to emit total hazardous air pollutants (HAPs) from emission sources throughout the facility, which exceeds the applicability threshold of 25 tons per year (tpy) specified in 6NYCRR201-6 for Title V Facility Permits. Buffalo Newspress has chosen to accept limitations to restrict the amount of HAPs emitted from the facility to 24 tpy and,

therefore, is not required to obtain a Title V permit.

Facility-wide actual emissions of total HAPs shall not exceed 24 tpy as determined by summing the individual monthly total HAPs emissions during any consecutive 12-month period from all HAP contributing activities. Total facility HAP emissions include all HAPs emitted, even those that do not have a PTE of 10 tpy or greater. Emissions shall be determined as follows or in another manner acceptable to NYSDEC and USEPA:

Monthly Total HAPs (lbs/mo) = ER1 + ER2 + ER3 + ER4 + ER5

COLD-SET INKS:
Emissions from cold-set inks (ER1) may be determined using a 95% retention factor as follows:

ER1 = cold-set ink (new and recycled) usage rate (lbs/mo) * % Total HAPs Content/100 * 0.05

HEAT-SET INKS:
When emissions from heat-set inks pass through an RTO at the required minimum operating temperature of 1500 F, without any bypass, a 20% retention factor and a 95% overall removal efficiency* may be used to determine the total HAP emission rate (ER2) as follows (* Buffalo Newspress must operate all dryers associated with heatset presses under negative pressure, sufficient to capture 100% of the VOC emissions from heatset inks, varnishes and other coatings generated during the printing process):

ER2 = heat-set ink (new and recycled) usage rate (lbs/mo) * % total HAP Content/100 * 0.8 * 0.05

If for any reason the RTO is operating lower than the required temperature or if the RTO is bypassed, due to an emergency, the 95% overall removal efficiency shall not be used to determine total HAP emissions. The total HAP emission rate (ER3) shall be based on usage during that time period, the total HAP content in the inks and a 20% retention factor. The total HAP emissions for each event shall be calculated as follows and added to the monthly emission rate.

ER3 = heat-set ink (new and recycled) usage rate (lbs) * % total HAP Content/100 * 0.8

SOLVENTS (fountain solution, blanket wash, cleaning solvents, etc.), COATINGS, SEALANTS and

ADHESIVES:
Emission rate (ER4) shall be calculated assuming 100% loss of total HAPs contained in these products to the ambient air.

ER4 = solvent/coatings/adhesives (new and recycled) usage rate (lbs/mo) * % total HAP Content/100

OTHER SOURCES OF TOTAL HAPS (I.E., PREPRESS, EXEMPT & TRIVIAL ACTIVITIES):

ER5 = usage rate (lbs/mo) * %Total HAP Content of Product/100

The Facility shall keep and maintain records for each process and other HAP contributing activities to determine actual total HAP emissions based on verifiable data. These records shall include the following information:

1) A current list of all HAP containing products used throughout the facility, including but not limited to, inks, coatings, solvents, sealants and adhesives. This list shall include information on the manufacturer, brand, product name or code; HAP content in pounds per gallon or percent by weight and density (lb/gallon)/specific gravity; and/or manufacturer's product specifications, material content reports, or laboratory analyses providing this information;

2) A monthly log of the consumption of each solvent (including solvents used in cleanup and surface preparation and any recycled solvents), ink (including recycled waste ink), coating, sealant, adhesive, etc. used;

3) All purchase orders, invoices, repair/maintenance records, usage and production records, control equipment malfunction/repair/maintenance records and other documents to support information in the monthly log; and

4) All calculations used to determine the monthly emissions, including periods of control equipment malfunction, bypass and repair.

5) All time periods when the RTO is bypassed and/or when the combustion temperature falls below 1500 F, shall be recorded in a permanently bound logbook or electronically on a secure server. This record shall include cause and corrective action taken to correct the problem.

To reduce unnecessary HAP emissions to the environment,

Buffalo Newspress shall comply with the following handling, storage and disposal requirements for HAP containing compounds: (1) do not use open containers to store or dispose of cloth or paper impregnated with solvents that are used for surface preparation, cleanup or ink/coating removal: (2) do not store spent or fresh solvents to be used for surface preparation, cleanup or ink/coating removal in open containers; (3) do not use open containers to store or dispense inks and/or surface coatings or solvents unless production, sampling, maintenance or inspection procedures require operational access. This does not apply to the actual device or equipment designed for the purpose of applying an ink or a coating to a substrate; and (4) do not use open containers to store or dispose of inks and or surface coatings.

An exceedance of this emission limit, failure to fulfill the recordkeeping and reporting requirements and/or failure to maintain the good work/housekeeping practices specified in this condition constitutes a violation of 6NYCRR201-6. Exceedance of this limit must be reported to the Department immediately via telephone during normal working hours, but no later than 2 business days after the occurrence. A written report shall be submitted to the Department within 30 days of the occurrence and shall include the cause of the exceedance, corrective action taken, contaminants emitted and an estimate of the emissions.

Parameter Monitored: INKS, SOLVENTS AND ADHESIVES
Upper Permit Limit: 24 tons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 10: Capping Monitoring Condition
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 10.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

6 NYCRR Subpart 231-2

Item 10.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 10.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 10.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 10.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 10.6:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 10.7:
Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Buffalo Newspress has an annual potential to emit volatile organic compounds (VOCs) from all emission sources throughout the facility, which exceeds the applicability threshold of 50 tons per year (tpy) specified in 6NYCRR201-6 for Title V Facility Permits. Buffalo Newspress has chosen to accept limitations to restrict the amount of VOCs emitted from the facility to 49 tpy and, therefore, is not required to obtain a Title V permit. The need to determine the applicability of 6NYCRR231: New Source Review for New and Modified Facilities for the facility is also eliminated by restricting the potential to emit VOCs to below the major source threshold of 50 tpy.

Facility-wide actual emissions of VOCs shall not exceed 49 tpy as determined by summing the individual monthly total VOC emissions during any consecutive 12-month period from all VOC contributing activities. Emissions shall be determined as follows or in another manner acceptable to NYSDEC and USEPA:

Monthly Total VOCs (lbs/mo) = ER1 + ER2 + ER3 + ER4 + ER5

COLD-SET INKS:
Emissions from cold-set inks (ER1) may be determined using a 95% retention factor as follows:

ER1 = cold-set ink (new and recycled) usage rate (lbs/mo) * %Total VOC Content of Ink/100 * 0.05

HEAT-SET INKS:
When emissions from heat-set inks pass through the RTO at the required minimum operating temperature of 1500 F, without any bypass, a 20% retention factor and 95% overall removal efficiency* may be used to determine the VOC emission rate (ER2) as follows (* Buffalo Newspress must operate all dryers associated with heatset presses under negative pressure, sufficient to capture 100% of the VOC emissions from heatset inks, varnishes and other coatings generated during the printing process):

ER2 = heat-set ink (new and recycled) usage rate (lbs/mo) * %Total VOC Content of Ink/100 * 0.8 * 0.05

If for any reason the RTO is operating lower than the required temperature or if the RTO is bypassed, the 95 % overall removal efficiency shall not be used to determine VOC emissions. The VOC emission rate (ER3) shall be based on usage during that time period, the VOC content in the inks and a 20% retention factor. The VOC emissions for each event shall be calculated as follows and added to the monthly emission rate.

ER3 = heat-set ink (new and recycled) usage rate (lbs) * %Total VOC Content of Ink/100 * 0.8

SOLVENTS (fountain solution, blanket wash, cleaning solvents, etc.), COATINGS, SEALANTS AND ADHESIVES:
Assume that 100% of the VOCs contained in these products are emitted to the ambient air. Emission rate (ER4) shall be calculated as follows:

ER4 = solvents/coatings/sealants/adhesives (new and recycled) usage rate (lbs/mo) * %Total VOC Content of

product/100

OTHER SOURCES (I.E., PREPRESS, EXEMPT AND TRIVIAL ACTIVITIES):

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

The Facility shall keep and maintain records for each process and other VOC contributing activities to determine actual total VOC emissions based on verifiable data. These records shall include the following information:

1) A current list of all VOC containing products used, including but not limited to, inks, coatings, solvents, adhesives, etc. in use throughout the facility. This list shall include information on the manufacturer, brand, product name or code; VOC content in pounds per gallon, or percent by weight and density (lb/gallon); and/or manufacturer's product specifications, material VOC content reports, or laboratory analyses providing this information;

2) A monthly log of the consumption of each solvent (including solvents used in cleanup and surface preparation and any recycled solvents), ink (including recycled waste ink), coating, sealant, adhesive, etc. used;

3) All purchase orders, invoices, repair/maintenance records, usage and production records and other documents/information to support information in the monthly log;

4) All calculations used to determine the monthly emissions, including periods of control equipment malfunction, bypass, and repair;

5) All time periods when the RTO is bypassed and/or when the combustion temperature falls below 1500 F, shall be recorded in a permanently bound logbook or electronically on a secure server. This record shall include cause and corrective action taken to correct the problem; and

6) a description of equipment used during and after ink/coating/solvent, ink sealant or adhesive application, including type, make and model; maximum design process rate or throughput; a description of the ink/coating/solvent application/drying method(s) employed; and all emission control unit information, including 1) information on emission control equipment type and

description, make and model, and emission sources served by the emission control unit, 2) information on emission control equipment design, including where applicable: pollutant(s) controlled; control effectiveness; maximum design or rated capacity; inlet and outlet temperatures; concentrations of each pollutant controlled; heat exchange media (type, material, life, volume, pressure drop operating range, etc.); other design data as appropriate; 3) all emission source test information; and 4) a monthly log of hours of operation including notation of any control equipment breakdowns, upsets, repairs, maintenance and any other deviations from design parameters and/or permit requirements.

To reduce unnecessary VOC emissions to the environment, Buffalo Newspress shall comply with the handling, storage and disposal requirements for VOC containing compounds as required under 6NYCRR234.6.

An exceedance of this emission limit, failure to fulfill the recordkeeping and reporting requirements and/or failure to maintain the good work/housekeeping practices specified in this condition constitutes a violation of 6NYCRR201-6 and 6NYCRR231. Exceedance of any limit must be reported to the Department immediately via telephone during normal working hours, but no later than 2 business days after the occurrence. A written report shall be submitted to the Department within 30 days of the occurrence and shall include the cause of the exceedance, corrective action taken, contaminants emitted and an estimate of the emissions.

Parameter Monitored: INKS, SOLVENTS AND ADHESIVES
Upper Permit Limit: 49 tons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 11: Capping Monitoring Condition
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 11.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

Item 11.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 11.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 11.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 11.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 11.6:
The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 001330-20-7 XYLENE, M, O & P MIXT.

Item 11.7:
Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Buffalo Newspress has an annual potential to emit (PTE) individual hazardous air pollutants (HAPs) from emission sources throughout the facility, which exceeds the applicability threshold of 10 tons per year (tpy) specified in 6NYCRR201-6 for Title V Facility Permits. Buffalo Newspress has chosen to accept limitations to restrict the amount of individual HAPs emitted from the facility to 9 tpy each based on a 12-month rolling total of facility-wide actual individual HAP emissions. Therefore, the Facility is not subject to the requirements of 6NYCRR201-6: Title V Facility Permits. This monitoring condition shall apply to each individual HAP emitted from

the facility that has a PTE equal to or greater than 10 tpy. To verify the applicability of this requirement a current listing of each individual HAP emitted with the corresponding PTE shall be maintained. Calculations and information used to determine the PTEs shall be available for NYSDEC review upon request. The HAPs listed in this monitoring condition are not all inclusive and may change with products and usage rates.

Facility-wide actual emissions of individual HAPs shall not exceed 9 tpy as determined by summing the monthly individual HAP emissions during any consecutive 12-month period from all HAP contributing activities. Emissions shall be determined as follows or in another manner acceptable to NYSDEC and USEPA:

Monthly Total HAPs (lbs/mo) = ER1 + ER2 + ER3 + ER4 + ER5:

COLD-SET INKS:
Emissions from cold-set inks (ER1) may be determined using a 95% retention factor as follows:

ER1 = cold-set ink (new and recycled) usage rate (lbs/mo) * % indiv HAP Content/100 * 0.05:

HEAT-SET INKS:
When emissions from heat-set inks pass through the RTO at the required minimum operating temperature of 1500 F, without bypass, a 20% retention factor and a 95% overall removal efficiency* may be used to determine the total HAP emission rate (ER2) as follows (* Buffalo Newspress must operate all dryers associated with heatset presses under negative pressure, sufficient to capture 100% of the VOC emissions from heatset inks, varnishes and other coatings generated during the printing process):

ER2 = heat-set ink (new and recycled) usage rate (lbs/mo) * % indiv HAP Content/100 * 0.8 * 0.05

If for any reason the RTO is operating lower than the required temperature or if the RTO is bypassed, the 95% overall removal efficiency shall not be used to determine individual HAP emissions. The individual HAP emission rate (ER3) shall be based on usage during that time period, the individual HAP content in the inks and a 20% retention factor. The total HAP emissions for each event shall be calculated as follows and added to the monthly emission rate.

ER3 = heat-set ink (new and recycled) usage rate (lbs) * % indiv HAP Content/100 * 0.8

SOLVENTS (fountain solution, blanket wash, cleaning solvents, etc.), COATINGS, SEALANTS AND ADHESIVES:
Emission rate (ER4) shall be calculated assuming 100% loss of individual HAPs contained in these products to the ambient air.

ER4 = solvent/coatings/sealants/adhesives (new and recycled) usage rate (lbs/mo) * % indiv HAP Content/100

OTHER SOURCES OF INDIVIDUAL HAP EMISSIONS (I.E., PREPRESS, EXEMPT&TRIVIAL ACTIVITIES):

ER5 = usage rate (lbs/mo) * % Indiv HAP Content of Product/100

The Facility shall keep and maintain records for each process and other HAP contributing activities to determine actual individual HAP emissions based on verifiable data. These records shall include the following information:

1) A current list of all HAP containing products used throughout the facility, including but not limited to, inks, coatings, solvents, sealants and adhesives. This list shall include information on the manufacturer, brand, product name or code; HAP content in pounds per gallon or percent by weight and density (lb/gallon)/specific gravity; and/or manufacturer's product specifications, material content reports, or laboratory analyses providing this information;

2) A monthly log of the consumption of each solvent (including solvents used in cleanup and surface preparation and any recycled solvents), ink (including recycled waste ink), coating, sealant, adhesive, etc. used;

3) All purchase orders, invoices, repair/maintenance records, usage and production records, control equipment malfunction/repair/maintenance records and other documents to support information in the monthly log; and

4) All calculations used to determine the monthly emissions, including periods of control equipment malfunction, bypass and repair.

5) All time periods when the RTO is bypassed and/or when the combustion temperature falls below 1500 F, shall be recorded in a permanently bound logbook or electronically

on a secure server. This record shall include cause and corrective action taken to correct the problem.

To reduce unnecessary HAP emissions to the environment, Buffalo Newspress shall comply with the following handling, storage and disposal requirements for HAP containing compounds: (1) do not use open containers to store or dispose of cloth or paper impregnated with solvents that are used for surface preparation, cleanup or ink/coating removal: (2) do not store spent or fresh solvents to be used for surface preparation, cleanup or ink/coating removal in open containers; (3) do not use open containers to store or dispense inks and/or surface coatings or solvents unless production, sampling, maintenance or inspection procedures require operational access. This does not apply to the actual device or equipment designed for the purpose of applying an ink or a coating to a substrate; and (4) do not use open containers to store or dispose of inks and or surface coatings.

An exceedance of this emission limit, failure to fulfill the recordkeeping and reporting requirements and/or failure to maintain the good work/housekeeping practices specified in this condition constitutes a violation of 6NYCRR201-6. Exceedance of this limit must be reported to the Department immediately via telephone during normal working hours, but no later than 2 business days after the occurrence. A written report shall be submitted to the Department within 30 days of the occurrence and shall include the cause of the exceedance, corrective action taken, contaminants emitted and an estimate of the emissions.

Parameter Monitored: INKS, SOLVENTS AND ADHESIVES
Upper Permit Limit: 9 tons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 12: Air pollution prohibited
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 12.1:
No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to

property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 13: Once in, always in
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 234.1 (c)

Item 13.1:

A printing process that is subject to the provisions of Part 234 will remain subject to these provisions even if the emission of VOC from the facility or printing press later falls below the applicability criteria.

Condition 14: Compliance Demonstration
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 234.3 (c) (1) (ii)

Item 14.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: A-00001
Process: 001 Emission Source: 00008

Emission Unit: A-00001
Process: 002 Emission Source: 00008

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

Item 14.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
An offset lithographic or letterpress printing process that uses cleaning materials containing VOC shall not operate if it is located in a severe ozone non-attainment area or at a facility with total actual annual VOC graphic arts emissions of three tons or more on a 12-month rolling basis, unless the cleaning material, as applied, has a composite vapor pressure of less than or equal to 10 millimeters mercury at 20 degrees Celsius (10 mm Hg at 20°C).

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: SOLVENT
Parameter Monitored: COMPOSITE VAPOR PRESSURE
Upper Permit Limit: 10 millimeters of mercury
Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration
Effective between the dates of 07/06/2015 and 07/05/2025

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

Item 15.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: A-00001
Process: 001

Emission Unit: A-00001
Process: 002

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

Item 15.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
Cold-set and heat-set web offset lithographic printing processes that use fountain solutions containing VOC shall not operate if located in a severe ozone non-attainment area or at a facility with total actual annual VOC graphic arts emissions of three tons or more on a 12-month rolling basis, unless the fountain solution as applied contains no more than five percent (5%) alcohol substitute by weight and no alcohol.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: FOUNTAIN SOLUTION
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 5 percent alcohol substitute
Reference Test Method: USEPA APPROVED METHODS
Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY

TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 16: Compliance Demonstration
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 234.5

Item 16.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 16.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

A person shall not sell, specify, or require the application of a coating, ink or adhesive on a substrate if such activity is prohibited by any of the provisions of this Part. The prohibition of this section shall apply to all written or oral contracts under the terms of which a coating, ink or adhesive is to be applied to a substrate.

This prohibition shall not apply to the following:

(1) Ink, coating, or adhesive used in printing processes where control equipment has been installed to demonstrate compliance with this Part; or

(2) Ink, coating, or adhesive used in printing processes that have been granted variances for reasons of technological and economic feasibility per section 234.3(f) of this Part.

A person selling an ink, coating, or adhesive used in a printing process subject to this Part must, upon request, provide the buyer with certification of the VOC content of the coating, ink or adhesive supplied.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 17: Compliance Demonstration
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 234.6

Item 17.1:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 17.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

An owner or operator of a facility subject to this Part shall not:

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

(b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(c) Use open containers to store, dispose or dispense ink, coating or adhesive 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, coating or adhesive to a substrate.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 18: Compliance Demonstration
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 234.7

Item 18.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 18.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Purchase, use, and production records of ink, coating, adhesive, VOCs, solvent, fountain solution and cleaning material must be maintained in a format acceptable to the department, and upon request, submitted to the department. Any other information required to determine compliance with this Part must be provided to the department in an acceptable format. Records must be maintained at the facility for five years.

The results of an analysis or other procedure used to establish compliance with this Part must be provided to the department. Department representatives shall be permitted, during reasonable business hours, to obtain

ink, coating, adhesive, cleaning material and fountain solution samples to determine compliance with this Part.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 19: Compliance Demonstration
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable Federal Requirement:6 NYCRR 234.8

Item 19.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: A-00001 Emission Point: 00001

Emission Unit: A-00001 Emission Point: 00002

Emission Unit: A-00001 Emission Point: 00003

Emission Unit: A-00001 Emission Point: 00004

Emission Unit: A-00001 Emission Point: 00005

Emission Unit: A-00001 Emission Point: 00007

Emission Unit: A-00001 Emission Point: 00008

Emission Unit: A-00001 Emission Point: 00009

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

Item 19.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
A person shall not cause or allow emissions having an average opacity of 10 percent or greater for any consecutive six minute period from any emission source subject to this Part into the outdoor atmosphere. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Compliance with this requirement shall be determined by the facility owner/operator during each shift by conducting a survey of visible emissions from the emission

points specified in this condition when printing processes are in operation for a minimum of 2 observations per day during daylight hours. Unless a certified visible emissions evaluator is onsite to verify that the opacity of facility emissions are less than 10%, if visible emissions (> 0 %) are identified at any time, the permittee shall determine the cause, make the necessary correction, and verify that the visible emissions problem has been corrected. If visible emissions continue, the permittee will conduct a Method 9 assessment of the sources associated with the potential noncompliance to determine the degree of opacity within the next operating day. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

The results of the observations must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack: date and time of day; observer's name; identity of emission point; weather condition; was a plume observed? Inclement weather conditions shall be recorded for those days when observations are prohibited. Records of visible emissions observations (and results of any follow-up method 9 analysis), investigations and corrective actions shall be kept on-site in a format acceptable to the Department. The annual certification report must include a summary of any exceedances. This logbook must be retained at the facility for five (5) years after the date of the last entry.

Parameter Monitored: OPACITY
Upper Permit Limit: 10 percent
Reference Test Method: USEPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

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

Item A: **Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**
Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item B: **General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state only enforceable.

Condition 20: **Contaminant List**
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable State Requirement:ECL 19-0301

Item 20.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

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

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

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

Condition 21: Malfunctions and start-up/shutdown activities
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable State Requirement:6 NYCRR 201-1.4

Item 21.1:
(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 22: Emission Unit Definition
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 22.1:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: A-00001
Emission Unit Description:
This emission unit consists of 7 four color web offset lithographic printing presses which are utilized to print weekly newspapers, advertising supplements and various publications. The press models are as follows: Emission Source (ES) 00001: (1) Harris N936-4 (4 units); ES 00002: (1) Harris N946-4 (4 units); ES 00005: (1) Harris V-15D-12 (12 units), ES 00006: (1) Harris V-15A-8 (8 units), ES 00010: (1) Heidelberg V30 (8 units), ES 00012: Harris N946II (4 units) and ES 00014: Goss Magnum EP-19146 (4 units). All of the presses are capable of printing cold-set inks (Process 001). Emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) from Process 001 are fugitive and are exhausted through four roof vents (emission points 00002, 00003, 00004, and 00005). In addition, the Harris N936, Harris N946, Heidelberg V30, Harris N946II and Goss Magnum EP-19146 presses are capable of printing heat-set inks (Process 002). When heat-set inks are utilized, the ink is cured in negative pressure, gas fired, hot air drying ovens which exhaust to regenerative thermal oxidizers (RTOs) (ES Control 00007 (MEGTEC Millennium RTO) for ES 00001 and ES 00002, ES Control 00009 (Airex/Adwest RTO) for ES 00010, ES Control 00011 (TANN RTO) for ES 00012 and ES Control 00013 (TANN RTO #2) for ES 00014). Other sources of VOCs and HAPs are the fountain solution and developer, solvent based cleaners, adhesives and coatings used during the printing processes and for other activities throughout the facility. Both Process 001 and Process 002 include ES 00008, the manual cleaning of the presses with a solvent mixture containing VOCs and HAPs (blanket wash).

Building(s): 01

Condition 23: Renewal deadlines for state facility permits
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 23.1:
The owner or operator of a facility having an issued state facility 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.

Condition 24: Compliance Demonstration
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 24.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 24.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 25: Visible Emissions Limited
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable State Requirement:6 NYCRR 211.2

Item 25.1:
Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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

Condition 26: Emission Point Definition By Emission Unit
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 26.1:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: A-00001

Emission Point: 00001
Height (ft.): 32 Diameter (in.): 24
NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01

Emission Point: 00002
Height (ft.): 28 Diameter (in.): 52
NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01

Emission Point: 00003
Height (ft.): 28 Diameter (in.): 52
NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01

Emission Point: 00004
Height (ft.): 28 Diameter (in.): 52
NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01

Emission Point: 00005
Height (ft.): 28 Diameter (in.): 52
NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01

Emission Point: 00007
Height (ft.): 37 Diameter (in.): 26
NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01

Emission Point: 00008
Height (ft.): 34 Diameter (in.): 22
NYTMN (km.): 4755.52 NYTME (km.): 184.179 Building: 01

Emission Point: 00009
Height (ft.): 30 Diameter (in.): 18
NYTMN (km.): 4755.596 NYTME (km.): 184.349 Building: 01

Condition 27: Process Definition By Emission Unit
Effective between the dates of 07/06/2015 and 07/05/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 27.1:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00001
Process: 001 Source Classification Code: 4-05-004-33

Process Description:
This Process consists of all seven web offset lithographic printing operations in which cold-set inks are applied to paper/film substrates (Emission Sources 00001, 00002, 00005, 00006, 00010, 00012 and 00014). The cold-set inks have very low volatility. The inks dry via absorption or oxidation instead of evaporation, which results in 95% of the VOCs being retained by the substrate. Presses are cleaned manually with a solvent mixture (blanket wash), which is identified as Emission Source 00008. All emissions are fugitive and are exhausted to the atmosphere through four roof vents described as emission points 00002, 00003, 00004, and 00005.

Emission Source/Control: 00001 - Process
Design Capacity: 4 Color Units

Emission Source/Control: 00002 - Process
Design Capacity: 4 Color Units

Emission Source/Control: 00005 - Process
Design Capacity: 12 Color Units

Emission Source/Control: 00006 - Process
Design Capacity: 8 Color Units

Emission Source/Control: 00008 - Process

Emission Source/Control: 00010 - Process
Design Capacity: 8 Color Units

Emission Source/Control: 00012 - Process
Design Capacity: 4 Color Units

Emission Source/Control: 00014 - Process
Design Capacity: 4 Color Units

Item 27.2:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00001
Process: 002 Source Classification Code: 4-02-900-13
Process Description:
This process consists of five web offset lithographic printing operations (Emission Sources (ES) 00001, 00002, 00010, 00012 and 00014) in which heat-set inks are applied to a continuous web film and cured in negative pressure, gas fired, hot air drying ovens operated at 275 deg F +/- 50 deg F. The VOC and HAP emissions from the dryers associated with ES 00001 and ES 00002 are controlled by a regenerative thermal oxidizer (RTO), identified as

Emission Source Control (ESC) 00007 and exhausted to the atmosphere through Emission Point (EP) 00001. The VOC and HAP emissions from the dryer associated with ES 00010 are controlled by an RTO, identified as ESC 00009 and exhausted to the atmosphere through EP 00007. The VOC and HAP emissions from the dryer associated with ES 00012 are controlled by an RTO, identified as ESC 00011 and exhausted to the atmosphere through EP 00008. The VOC and HAP emissions from the dryer associated with ES 00014 are controlled by an RTO, identified as ESC 00013 and exhausted to the atmosphere through EP 00009.The manual cleaning of the presses with solvent mixture is identified as ES 00008. The fugitive emissions from ES 00008 are exhausted to the atmosphere through EPs 00002, 00003, 00004, and 00005.

Emission Source/Control: 00007 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00009 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00011 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00013 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00001 - Process
Design Capacity: 4 Color Units

Emission Source/Control: 00002 - Process
Design Capacity: 4 Color Units

Emission Source/Control: 00008 - Process

Emission Source/Control: 00010 - Process
Design Capacity: 8 Color Units

Emission Source/Control: 00012 - Process
Design Capacity: 4 Color Units

Emission Source/Control: 00014 - Process
Design Capacity: 4 Color Units