



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1430-00310/00001
Effective Date: 12/30/2015 Expiration Date: 12/29/2025

Permit Issued To: DUAL PRINT AND MAIL LLC
340 NAGEL DR
CHEEKTOWAGA, NY 14225

Contact: JAMES J SABIO
DUAL PRINT AND MAIL LLC
340 NAGEL DR
BUFFALO, NY 14225
(716) 684-3825

Facility: DUAL PRINT AND MAIL LLC
340 NAGEL DR
CHEEKTOWAGA, NY 14225

Contact: TONY SANTOS
340 NAGEL DR
BUFFALO, NY 14225
(716) 684-3825

Description:

AIR STATE FACILITY (ASF) PERMIT DESCRIPTION
DUAL PRINT AND MAIL LLC
DEC I.D. NO. 9-1430-00310
REN 1 MOD 0

Dual Print and Mail LLC is a commercial sheet-fed/web offset lithographic printing facility that produces various types of printed products for its customers. The Facility, which is located at 340 Nagel Drive in Cheektowaga, New York, emits particulates and volatile organic compounds (VOCs), including hazardous air pollutants (HAPs), contained in the inks, fountain solution, blanket wash, developers, cleaners, adhesives and other products used throughout the facility. The Facility operates 24 hours per day, 6 days per week in a basic nonattainment area for ozone. The Standard Industrial Classification Code for Dual Print and Mail LLC is 2752 - Commercial Printing, Lithographic. The ASF permit includes a limit on facility-wide emissions of total VOCs, total HAPs and individual HAPs to less than 50 tpy, 25 tpy and 10 tpy, respectively, which Dual Print and Mail LLC chose to comply with to avoid being subject to Title V and New Source Review requirements. This permit modification is for the addition of applicable requirements specified in 6NYCRR234 Graphic Arts, which applies to any graphic arts facility that emits total actual annual VOC graphic art emissions of 3 tons or more on a 12-month rolling basis. In addition, a renewal requirement under 6NYCRR201-5 was added to the ASF permit, existing applicable requirements that were revised since the last permit



modification were updated and the facility's name was changed from Dual Printing Inc to Dual Print and Mail LLC.

Dual Print and Mail LLC operates two cold-set sheet-fed offset lithographic presses, including one 10-color press and one 8-color press, identified as Emission Source (ES) 10002 and ES 80001, respectively. Volatile organic compounds and HAPs from the cold-set printing process are exhausted to the ambient air via Emission Point (EP) 0001 and EP 0002, respectively. Particulates generated by the application of spray powder at the cold-set presses are controlled via particulate filters Emission Source Control (ESC) CRTL1 and CRTL2, which are located in the exhaust hoods associated with EP 0001 and EP 0002. The facility also operates one 4-color heat-set web offset lithographic printing press with an integrated dryer and recuperative thermal oxidizer to control VOC and HAP emissions from heat-set inks and fountain solution. The press is identified as ES 40002 and the integrated dryer and RTO are identified as ESC RTO01. VOC, HAP and particulate emissions from the RTO are exhausted to the ambient air through EP 0005. The operation of the press with heat-set inks is identified as Process 002 and the automatic cleaning of the heat-set press with solvent impregnated rolls is identified as ES BW003. Facility activities also include the automatic and manual cleaning of presses with solvents identified as ES BW001, digital and conventional pre-press operations, identified as ES PRE01 and various post-press operations including cutting, folding and binding, identified as ES POST1. Fugitive VOCs, HAPs and particulates generated by graphic art and associated activities are emitted to the ambient air through EP 0003, EP 0004, building vents and other openings. EP 0003 and EP 0004 are equipped with particulate filters, identified as ESC CRTL3 and CRTL4, respectively. Pre-press, cold-set press, and post-press operations are identified as Process 001. Spent inks and solvents are sent offsite for disposal. All printing operations are contained in Emission Unit (EU) A-10000. The Facility recycles waste paper after it is collected via a cyclone and baler. Particulates created by this process are controlled with a baghouse that is vented indoors. Dual Printing operates a natural gas fired heating unit that is exempt from permitting in accordance with 6NYCRR 201-3.2 (c) (1).

Dual Print and Mail LLC must comply with all applicable requirements specified under 6NYCRR234: Graphic Arts, which includes control requirements, testing and monitoring, handling, storage and disposal requirements, recordkeeping requirements and an opacity limit for printing operations. Dual Print and Mail LLC must continue to operate within the limits of the emission CAPs specified in this permit under 6NYCRR201-7.1 and comply with the particulate and opacity limits and reporting and recordkeeping requirements specified under 6NYCRR212: Process Operations and 6NYCRR211: General Prohibitions. Compliance with the emission CAPs shall be determined by summing the individual monthly total VOC, total HAP and individual HAPs emitted from all sources at the facility during any consecutive 12-month period. A report is due within 30 calendar days of the end of each year certifying compliance with these emission limits. Additional requirements for the heat-set press include operation only while maintaining a vacuum in the dryer to capture VOCs and operating the RTO at a minimum temperature of 1400 degrees Fahrenheit with 0.845 second residence time to achieve a minimum 95% destruction efficiency. The vacuum pressure of the dryer and the combustion chamber temperature of the RTO must be continuously monitored and recorded. Operation, maintenance, start-up and shutdown must be carried out in accordance with the permit and the procedures detailed in the Preventative Maintenance, Operating and Emergency Shutdown Plan, which must be revised and submitted to NYSDEC for approval within 120 days of issuance of this permit. This Plan, identified under 6NYCRR200-7 -Maintenance of Equipment, will be an addendum to

New York State Department of Environmental Conservation
Facility DEC ID: 9143000310



the ASF permit. In accordance with 6NYCRR211.1, Dual Print and Mail LLC must operate their facility in a manner that minimizes the release of fugitive emissions to the ambient air.

This Air State Facility permit contains a listing of the applicable federal, state and compliance monitoring requirements for the facility.

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

Permit Administrator: DAVID S DENK
 DIVISION OF ENVIRONMENTAL PERMITS
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

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

Item 4.1:

The permittee must submit a renewal application at least 180 days before expiration of permits for both Title V and State Facility Permits.

Item 4.3:

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

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

Item 5.1:

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 6: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 6.1:

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

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: DUAL PRINT AND MAIL LLC
340 NAGEL DR
CHEEKTOWAGA, NY 14225

Facility: DUAL PRINT AND MAIL LLC
340 NAGEL DR
CHEEKTOWAGA, NY 14225

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

Permit Effective Date: 12/30/2015

Permit Expiration Date: 12/29/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.7: Maintenance of Equipment
- 2 6 NYCRR 200.7: Compliance Demonstration
- 3 6 NYCRR 201-7.1: Facility Permissible Emissions
- *4 6 NYCRR 201-7.1: Capping Monitoring Condition
- *5 6 NYCRR 201-7.1: Capping Monitoring Condition
- *6 6 NYCRR 201-7.1: Capping Monitoring Condition
- 7 6 NYCRR Subpart 202-1: Compliance Demonstration
- 8 6 NYCRR 211.1: Air pollution prohibited
- 9 6 NYCRR 211.1: Compliance Demonstration
- 10 6 NYCRR 212-1.4 (p): Compliance Demonstration
- 11 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 12 6 NYCRR 212-2.4 (b): Compliance Demonstration
- 13 6 NYCRR 234.1: Compliance Demonstration
- 14 6 NYCRR 234.3 (b) (1) (i): Compliance Demonstration
- 15 6 NYCRR 234.3 (b) (1) (iii): Compliance Demonstration
- 16 6 NYCRR 234.3 (c) (1): Compliance Demonstration
- 17 6 NYCRR 234.3 (c) (1) (i): Compliance Demonstration
- 18 6 NYCRR 234.3 (c) (1) (ii): Compliance Demonstration
- 19 6 NYCRR 234.3 (d) (1): Compliance Demonstration
- 20 6 NYCRR 234.3 (d) (1): Compliance Demonstration
- 21 6 NYCRR 234.3 (d) (1) (i) ('a'): Compliance Demonstration
- 22 6 NYCRR 234.3 (d) (1) (i) ('b'): Compliance Demonstration
- 23 6 NYCRR 234.3 (d) (1) (ii) ('a'): Compliance Demonstration
- 24 6 NYCRR 234.3 (d) (1) (ii) ('b'): Compliance Demonstration
- 25 6 NYCRR 234.4 (a): Compliance Demonstration
- 26 6 NYCRR 234.4 (b): Compliance Demonstration
- 27 6 NYCRR 234.4 (c): Compliance Demonstration
- 28 6 NYCRR 234.5: Compliance Demonstration
- 29 6 NYCRR 234.6: Compliance Demonstration
- 30 6 NYCRR 234.7: Compliance Demonstration
- 31 6 NYCRR 234.8: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 32 ECL 19-0301: Contaminant List
- 33 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 34 6 NYCRR Subpart 201-5: Emission Unit Definition
- 35 6 NYCRR 201-5.1 (a) (1): Compliance Demonstration
- 36 6 NYCRR 201-5.1 (a) (1): Compliance Demonstration
- 37 6 NYCRR 201-5.1 (a) (1): Compliance Demonstration
- 38 6 NYCRR 201-5.1 (a) (1): Compliance Demonstration
- 39 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 40 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 41 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 42 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit



43 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 12/30/2015 and 12/29/2025

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: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement:6 NYCRR 200.7

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Dual Print and Mail LLC operates a Megtec Dual-Dry TNV 119 Integrated Air Flotation Dryer and Oxidizer (Emission Source Control RTO01) to control VOC emissions from one 4-color web heat-set lithographic printing press (ES 40002), with a potential to emit 244 tons of VOCs per year. When operated and maintained properly, the integrated negative pressure dryer and recuperative thermal oxidizer (RTO) will allow Dual Print and Mail LLC to maintain VOC emissions below the facility emission limit specified in this permit to avoid the requirements of 6NYCRR201-6, "Title V Facility Permits" and 6NYCRR231-2, "New Source Review". The Megtec Dual-Dry TNV 119 will control the opacity of the stack gases from Emission Point 00005 to 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" and 6NYCRR212-1.6, "Limiting of Opacity". In addition, the Megtec Dual-Dry TNV 119 will allow Dual Print and Mail LLC to maintain contaminant emissions below the annual guideline concentrations (AGCs) and short-term guideline concentrations (SGCs) specified in DAR-1: "Guidelines for the Control of Toxic Ambient Air Contaminants" and to control nuisance odors associated with EP 00005 in accordance with 6NYCRR211.1, "Air pollution prohibited".



The owner or operator of any facility which uses air pollution control equipment to comply with an emissions cap, standard, limit or any other requirement must operate and maintain such equipment in a manner consistent with good engineering practices. Within 120 days of the issuance of this permit, Dual Print and Mail LLC shall submit a revised Preventative Maintenance, Operating and Emergency Shutdown Plan based on the requirements of this permit and the manufacturer's operation and maintenance manual(s) for ES Control RTO01 and any associated equipment. Operation, inspection, maintenance, calibration, monitoring, recordkeeping and reporting associated with ES Control RTO01 shall be conducted in accordance with the requirements specified in this permit and the Preventative Maintenance, Operating and Emergency Shutdown Plan. The revised Plan must be approved by NYSDEC and shall be considered part of the Air State Facility permit.

Dual Print and Mail LLC shall include a certified statement in the Annual Compliance Certification Report indicating that all requirements as specified in this condition have been fulfilled during the calendar year. All records shall be maintained onsite and shall be available for NYSDEC review upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 3: Facility Permissible Emissions
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 3.1:

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: 000067-56-1 PTE: 18,000 pounds per year
Name: METHYL ALCOHOL

CAS No: 000079-10-7 PTE: 18,000 pounds per year
Name: 2-PROPENOIC ACID

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



CAS No: 000091-20-3 Name: NAPHTHALENE	PTE: 18,000 pounds per year
CAS No: 000098-82-8 Name: BENZENE, (1-METHYLETHYL)	PTE: 18,000 pounds per year
CAS No: 000100-42-5 Name: STYRENE	PTE: 18,000 pounds per year
CAS No: 000107-21-1 Name: 1,2-ETHANEDIOL	PTE: 18,000 pounds per year
CAS No: 000110-80-5 Name: ETHANOL, 2-ETHOXY-	PTE: 18,000 pounds per year
CAS No: 000111-42-2 Name: ETHANOL, 2,2'-IMINOBIS-	PTE: 18,000 pounds per year
CAS No: 000111-90-0 Name: ETHANOL, 2- (2-ETHOXYETHOXY)	PTE: 18,000 pounds per year
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 4: Capping Monitoring Condition
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 4.1:

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 4.2:

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

Item 4.3:

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.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



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 4.4:

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 4.5:

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 4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Dual Print and Mail LLC has an annual potential to emit (PTE) volatile organic compounds (VOCs) from all emission sources throughout the facility that exceeds the major source applicability threshold of 50 tons per year (tpy) for VOCs specified under 6NYCRR201-6 for Title V Facility Permits and 6NYCRR231-2: New Source Review (NSR) in Nonattainment Areas and Ozone Transport Regions. Dual Print and Mail LLC has chosen to accept limitations to restrict the PTE VOCs from the facility to 49.0 tpy or less based on a 12-month rolling total and, therefore, is not required to obtain a Title V permit and avoids determining the applicability of 6NYCRR231-2.

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



emissions for the previous 11 months.

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

COLD-SET INKS and VARNISHES (only varnish that is pigment free, cold-set ink that is applied as overprint)

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

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

HEAT-SET INKS:

At times when the pressure of the dryer is maintained at a minimum vacuum pressure of - 0.3 in H₂O, 100% capture efficiency for VOCs from heat-set inks may be assumed.

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

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

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

$$\text{ER3} = \text{heat-set ink (new, recycled and rebled)} \\ \text{usage rate* (lbs)} \times \% \text{Total VOC Content of Ink} / 100 \times 0.8$$

FOUNTAIN SOLUTION USED WITH HEAT-SET INK:

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

When these conditions are met, the VOC emission rate (ER4)



shall be calculated as follows:

$$ER4 = \text{usage rate* (lbs/mo)} \times (\% \text{Total VOC Content of product**/100}) \times 0.335$$

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

$$ER5 = \text{usage rate* (lbs)} \times \% \text{Total VOC Content of product**/100}$$

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

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

$$ER6 = \text{usage rate* (lbs/mo)} \times \% \text{Total VOC Content of product**/100}$$

BLANKET WASH WITH A VOC COMPOSITE VAPOR PRESSURE OF 10

MM

HG @ 20 DEG C USED FOR THE MANUAL CLEANING OF PRESSES

ONLY

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

$$ER7 = \text{usage rate* (lbs/mo)} \times \% \text{Total VOC Content of product**/100} * 0.50$$

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



"other sources" shall be included in the facility-wide VOC emissions calculations. If required, the emission rate (ER8) shall be calculated as follows:

$ER8 = \text{usage rate}^* (\text{lbs}/\text{mo}) \times \% \text{ Total VOC Content of Product}^{**}/100$

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

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

The total VOCs contained in waste sent offsite may be subtracted from the total monthly VOC emissions calculated from purchase/usage records, as described above ONLY if the VOC content of the waste has been determined by an unaffiliated lab or waste disposal facility and can be verified by RCRA waste disposal records for this facility. If the VOCs contained in the waste sent offsite are deducted from the total monthly VOC emissions, the deduction shall be clearly indicated and shall be listed in a separate category, with the VOC content of the waste, determined as described above.

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

- a current list of all VOC containing products used for printing related activities throughout the facility with current information on the manufacturer and product name/code, VOC content (lb/gal or % by wt), material VOC content reports or laboratory analyses of VOC content, product vapor pressure, and other pertinent data;
- a monthly log of the consumption of any product containing VOCs used for printing related activities throughout the facility;
- any other information that supports the monthly log, such as purchase orders, invoices, equipment operation, maintenance and repair logs/records, production records, metering logs, original continuous temperature recordings for the RTO, dryer pressure records/readings, waste (ink, solvent, etc.) analysis and disposal records, etc.;
- all calculations used to determine the monthly emissions, including periods of control equipment malfunction and other uncontrolled periods, VOCs subtracted for waste sent offsite, etc.; and
- information, such as make, model, maximum design process rate or throughput, design data, etc. on equipment, including control equipment, used in any prepress, press and post press operation that emits



VOCs.

Within 30 days following each calendar year, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the 49.0 ton per year limit imposed by this VOC emissions cap. This shall include a VOC summary report which shall list the products used with reference to the associated category, i.e. inks, fountain solution, blanket wash, etc., the VOC content of the products, the quantity used each month, emission factors used to calculate VOC emissions, the total monthly VOC emissions, the rolling 12-month VOC emissions for each consecutive month of the period and a comparison to the 49.0 tpy limit. If Dual Print and Mail LLC chooses to reduce total monthly VOC emissions to account for waste disposed of offsite, then waste VOCs for that month shall be listed in a separate category with the quantity and VOC content of waste sent off site that month, and how VOC content was determined. Results of laboratory analyses of waste, RCRA reports, and any other supporting documentation shall be maintained onsite and shall be available for NYSDEC review upon request. All submittals to the Department shall be certified by the Facility's responsible official as to the truth, completeness, and accuracy of all information recorded and reported.

At all times, Dual Print and Mail LLC shall utilize good housekeeping skills and work practices to reduce unnecessary VOC emissions to the environment. An exceedance of the VOC emission limit, and/or failure to fulfill the requirements specified in this monitoring condition constitutes a violation of 6NYCRR201-6 and 6NYCRR231-2. Exceedance of the VOC limit must be reported to the Department within 30 days of the occurrence. All records shall be maintained onsite for a minimum of 5 years and shall be readily available for NYSDEC review upon request.

Parameter Monitored: INKS, SOLVENTS AND ADHESIVES
Upper Permit Limit: 49.0 tons per year
Monitoring Frequency: MONTHLY
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 5: Capping Monitoring Condition
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement: 6 NYCRR 201-7.1



Item 5.1:

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

6 NYCRR Subpart 201-6

Item 5.2:

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

Item 5.3:

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

Item 5.4:

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

Item 5.5:

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

Item 5.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

To avoid the requirements of 6NYCRR201-6, Title V Facility Permits, facility-wide actual emissions of total HAPs shall not exceed 24.0 tpy, as determined by summing the actual monthly emissions of individual HAPs, including individual HAPs that have a PTE less than 10 tpy, during any consecutive 12-month period from all HAP contributing



activities. Monthly and 12-month rolling totals of total HAPs shall be calculated as described in the capping condition for VOCs specified under 6NYCRR201-7.1, except that HAPs from "other sources" shall be included when actual total HAP emissions equal 20.0 tpy. The recordkeeping and reporting requirements specified in the capping condition for VOCs under 6NYCRR201-7.1 also apply to total HAPs. All submittals to the Department shall be certified by the Facility's responsible official as to the truth, completeness, and accuracy of all information recorded and reported.

Parameter Monitored: TOTAL HAP
Upper Permit Limit: 24.0 tons per year
Monitoring Frequency: MONTHLY
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 6: Capping Monitoring Condition
Effective between the dates of 12/30/2015 and 12/29/2025

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

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: 000067-56-1	METHYL ALCOHOL
CAS No: 000079-10-7	2-PROPENOIC ACID
CAS No: 000091-20-3	NAPHTHALENE
CAS No: 000098-82-8	BENZENE, (1-METHYLETHYL)
CAS No: 000100-42-5	STYRENE
CAS No: 000110-80-5	ETHANOL, 2-ETHOXY-
CAS No: 000111-42-2	ETHANOL, 2,2'-IMINOBIS-
CAS No: 000111-90-0	ETHANOL, 2- (2-ETHOXYETHOXY)
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 000107-21-1	1,2-ETHANEDIOL

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:

To avoid the requirements of 6NYCRR201-6, Title V Facility Permits, facility-wide actual emissions of individual HAPs shall not exceed 9.0 tpy each, as determined by summing the individual monthly HAP emissions during any consecutive 12-month period from all HAP contributing activities. This monitoring condition shall apply to each individual HAP emitted that has a potential to emit (PTE) equal to or greater than 10 tpy. The individual HAPs list is not all-inclusive and may change with products and usage rates. Monthly emissions and 12-month rolling totals for individual HAPs shall be calculated as described in the capping condition for VOCs specified under 6NYCRR201-7.1, except that individual HAPs from "other sources" shall be included when an individual HAP's actual facility emissions equals 7.0 tpy. The recordkeeping and reporting requirements specified in the capping condition for VOCs under 6NYCRR201-7.1 also apply to individual HAPs. All submittals to the Department shall be certified by the Facility's responsible official as to the truth, completeness, and accuracy of all information recorded and reported.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



Parameter Monitored: 1,2-ETHANEDIOL
Upper Permit Limit: 9.0 tons per year
Monitoring Frequency: MONTHLY
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 7: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement: 6 NYCRR Subpart 202-1

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The provisions of 6NYCRR Subpart 202-1: Emissions Testing, Sampling and Analytical Determinations apply to this facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 8: Air pollution prohibited
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement: 6 NYCRR 211.1

Item 8.1:

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 9: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement: 6 NYCRR 211.1

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

CAS No: 0NY998-00-0 VOC

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Openings to the outside of the building, such as doors, windows etc., near printing operations or other VOC generating activities shall not be left open for extended periods of time, unnecessarily, unless a system is in place, such as negative pressure - verified by a velometer or similar device - or a physical barrier, to minimize the release of contaminants from Dual Print and Mail LLC to the surrounding neighborhood. Activities that necessitate opening doors include maintenance, loading and unloading trucks and other activities required for business. Doors shall be open only the minimum time required to complete a task and shall be closed immediately upon completion or during periods of inactivity while conducting the task. Dual Print and Mail LLC shall make additional changes to their operations to reduce emissions and/or mitigate odors, if necessary. Any complaints received by Dual Print and Mail LLC regarding odors caused by the facility or associated operations shall be recorded in a permanently bound logbook and reported to the NYSDEC within 2 calendar days of occurrence. The cause of the problem shall be investigated and corrective action taken immediately. Details shall be provided to the NYSDEC in a written report within 30 days of the complaint. All records shall be maintained onsite for 5 years and shall be readily available upon request by the NYSDEC and/or USEPA.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 10: Compliance Demonstration

Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement:6 NYCRR 212-1.4 (p)

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

Graphic arts process operations subject to Section 234.1(a) of this Title and graphic arts process operations exempt from Part 234 of this Title pursuant to Section 234.1(d) are not subject to the provisions of this Part, only with respect to emissions of VOCs that are not given an A rating. For any contaminant emitted to the outdoor atmosphere that has been assigned an environmental rating of "A" by the department, including the highly toxic contaminants listed in §212.-2.2 Table 2, Dual Print and Mail LLC shall demonstrate compliance with 6NYCRR212-2.3(b), Table 4 - Degree of Air Cleaning Required for Non-Criteria Air Contaminants. Dual Print and Mail LLC shall maintain a list of contaminants generated by facility operations that are emitted to the outdoor atmosphere and shall verify their environmental ratings to determine 6NYCRR212 applicability. This list shall be updated quarterly and shall be maintained onsite, with supporting documentation, for a minimum of 5 years. The Annual Compliance Certification Report shall contain a statement describing the status of "A" rated contaminants emitted by Dual Print and Mail LLC during the calendar year, and, if 6NYCRR212 requirements for "A" rated contaminants become applicable, how compliance will be/has been demonstrated. All records shall be available for NYSDEC review upon request.

Monitoring Frequency: QUARTERLY
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: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement: 6 NYCRR 212-1.6 (a)

Item 11.1:

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

Emission Unit: A-10000	Emission Point: 00001
Emission Unit: A-10000	Emission Point: 00002
Emission Unit: A-10000	Emission Point: 00003
Emission Unit: A-10000	Emission Point: 00004
Emission Unit: A-10000	Emission Point: 00005



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

Item 11.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 12: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement:6 NYCRR 212-2.4 (b)

Item 12.1:

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

Emission Unit: A-10000	Emission Point: 00001
Emission Unit: A-10000	Emission Point: 00002
Emission Unit: A-10000	Emission Point: 00003
Emission Unit: A-10000	Emission Point: 00004
Emission Unit: A-10000	Emission Point: 00005

Regulated Contaminant(s):
CAS No: 0NY075-00-5 PM-10

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The control of particulate emissions released from new and modified process emission sources.



Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

This condition applies to particulate emissions from the application of spray powder and any other particulate generating activity that is exhausted to the ambient air through an emission point. The exhaust hood for each emission point shall be equipped with a particulate filter that covers the entire exhaust opening and is capable of meeting the specified particulate limit. To ensure maximum capture efficiency and minimize particulate emissions, application equipment and control equipment shall be utilized and maintained in accordance with manufacturer's specifications. To verify maintenance practices, filter changes shall be recorded in a log book and purchase orders/invoices shall be kept and made readily available for review by representatives from the NYSDEC or USEPA upon request. Records of filter type, make and model number, capture efficiency, manufacturer recommended maintenance requirements and any other pertinent information shall also be kept onsite and be available upon request. All records shall be maintained onsite for 5 years. A stack test to verify compliance with this limit must be conducted upon request by the department.

Parameter Monitored: PM-10
Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: 40 CFR Part 60, Appendix A, RM 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 13: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement: 6 NYCRR 234.1

Item 13.1:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



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

Emission Unit: A-10000

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

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a graphic arts facility is subject to all requirements of this Part, as specified, if the facility is located in a severe ozone non-attainment area or emits total actual annual volatile organic compound (VOC) graphic arts emissions of three tons or more on a 12-month rolling basis. A printing process that is subject to the provisions of this Part will remain subject to these provisions even if the emission of VOC from the facility or printing press later falls below the applicability criteria.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

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

Item 14.1:

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

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

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

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

(b) (1) A heat-set web offset lithographic printing process or heat-set letterpress printing process that uses ink, coating or adhesive containing VOC shall not operate if it: is located in a severe ozone non-attainment area;



has an annual potential to emit VOC of 25 tons per year or more; or is located at a facility that has an annual potential to emit VOC of 50 tons per year or more, unless the control equipment provides for an:

(i) overall removal efficiency of 90 percent or greater for control equipment that was first installed prior to the effective date of this regulation;

Overall removal efficiency may be determined without conducting a capture efficiency test of the system by demonstrating that the pressure in the heat-set press dryer is negative relative to the surrounding press room and that the direction of airflow is "into the dryer". Negative dryer pressure shall be established during the RTO performance test using an airflow direction indicator, such as a smoke stick or aluminum ribbons, or differential pressure gauge. If the dryer is operated at negative pressure, the capture efficiency for VOC from the heat-set lithographic inks and varnishes (coatings) formulated with low volatility ink oils can be assumed to be 100 percent of the VOC (ink oils) volatilized in the dryer.

To verify compliance with this VOC limit, Dual Print and Mail LLC shall conduct a performance test within one year of issuance of this permit. A stack test protocol shall be submitted 60 days prior to the scheduled performance test for NYSDEC review and approval. A stack test report shall be submitted to the Department for review and approval within 60 days of conducting the performance test. The performance test shall be repeated at least once per term of permit. Dual Print and Mail LLC may be required to conduct additional tests at the Department's discretion. All records regarding the performance test, including process operation records, shall be maintained onsite in a manner that is easily accessed upon request by NYSDEC and/or EPA representatives.

Dual Print and Mail LLC may elect to demonstrate compliance with either 6NYCRR234.3(b)(1)(i) or 6NYCRR234.3(b)(1)(iii)

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 90 percent by weight

Reference Test Method: 18, 25 or 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 15: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025



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

Item 15.1:

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

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

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

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A heat-set web offset lithographic printing process or heat-set letterpress printing process that uses ink, coating or adhesive containing VOC shall not operate if it: is located in a severe ozone non-attainment area; has an annual potential to emit VOC of 25 tons per year or more; or is located at a facility that has an annual potential to emit VOC of 50 tons per year or more, unless the control equipment provides for an outlet concentration of VOC from the emission control equipment equal to or less than 20 parts per million by volume (20 ppmv) as hexane on a dry basis.

To verify compliance with this VOC limit, Dual Print and Mail LLC shall conduct a performance test within one year of issuance of this permit. A stack test protocol shall be submitted 60 days prior to the scheduled performance test for NYSDEC review and approval. A stack test report shall be submitted to the Department for review and approval within 60 days of conducting the performance test. The performance test shall be repeated at least once per term of permit. Dual Print and Mail LLC may be required to conduct additional tests at the Department's discretion. All records regarding the performance test, including process operation records, shall be maintained onsite in a manner that is easily accessed upon request by NYSDEC and/or EPA representatives.

Dual Print and Mail LLC may elect to demonstrate compliance with either 6NYCRR234.3(b)(1)(i) or 6NYCRR234.3(b)(1)(iii)

Parameter Monitored: VOC



Lower Permit Limit: 20 parts per million by volume (dry)
Reference Test Method: Method 18, 25 or 25a
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 16: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

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

Item 16.1:

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

Emission Unit: A-10000

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

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Dual Print and Mail LLC may comply with either (c) (1) (i) or (c) (1) (ii) as specified elsewhere in this permit. Records, including MSDSs, Technical Data Sheets and/or Product Data Sheets that show VOC content and/or vapor pressure of each product used, the ratio, if mixed and the resulting "as applied" composite vapor pressure or % VOC content, for all cleaning materials used shall be maintained onsite. This information shall be summarized in the annual report required for verification of compliance with the 49.0 tpy limit on VOCs set to avoid the requirements of 6NYCRR201-6 and 6NYCRR231-2.

For the purpose of 6NYCRR234.3(c)(1), the following definitions, specified under 6NYCRR234.2, apply:
(b)(3) As applied. The VOC concentration of ink, coating, or adhesive at the time it is applied to a substrate; or the alcohol (or alcohol substitute) concentration of a fountain solution at the time it is applied to lithographic press plates.

(b)(5) Cleaning materials. A liquid solvent or solution used to remove ink and debris from the operating surfaces of the printing press and its parts. For purposes of this rule, cleaning solutions include, but are not limited to blanket wash, roller wash, metering roller cleaner, plate cleaner, impression cylinder washes, rubber rejuvenators, and other cleaners used for cleaning a



press, press parts, or to remove dried ink or coating from areas around the press.

(b)(7) Composite partial vapor pressure. The sum of the partial pressure of the compounds defined as VOCs and calculated in accordance with 6NYCRR234.2 (b)(7).

As per 6 NYCRR 234.7, 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 requirement. In addition, the results of an analysis or other procedure used to establish compliance with this requirement must be provided to the department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 17: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

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

Item 17.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-10000

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 17.2:

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 3 tons or more on a 12-month rolling basis, unless the cleaning material, as applied, contains less than 70.0 percent by weight VOC.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: CLEANING MATERIAL

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



Parameter Monitored: VOC CONTENT
Upper Permit Limit: 70.0 percent by weight
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 18: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

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

Item 18.1:

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

Emission Unit: A-10000

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

Item 18.2:

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 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: CLEANING MATERIAL
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 19: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

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

Item 19.1:

The Compliance Demonstration activity will be performed for the facility:



The Compliance Demonstration applies to:

Emission Unit: A-10000
Process: 001 Emission Source: 10002

Emission Unit: A-10000
Process: 001 Emission Source: 80001

Emission Unit: A-10000
Process: 002 Emission Source: 40002

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

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

In accordance with 6NYCRR234.3(d)(1)(i)(c), (d)(1)(ii)(c) and (d)(1)(iii), heat-set web offset lithographic printing processes, sheet-fed offset lithographic printing processes and cold-set web offset lithographic printing presses, respectively that use fountain solution 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 5.0 percent 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: 5.0 percent alcohol substitute

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 20: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

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

Item 20.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-10000



Process: 001

Emission Unit: A-10000
Process: 002

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

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Dual Print and Mail LLC may comply with any option specified in (d) (1) for heat-set web offset lithographic printing processes and sheet-fed offset lithographic printing processes as specified elsewhere in this permit. Records, including MSDSs, Technical Data Sheets and/or Product Data Sheets that show alcohol or alcohol substitute in % by weight, mixing directions and the resulting "as applied" composite weight % VOC content, for all fountain solutions used shall be maintained onsite. This information shall be summarized in the annual report required for verification of compliance with the 49.0 tpy limit on VOCs set to avoid the requirements of 6NYCRR201-6 and 6NYCRR231-2.

For the purpose of 6NYCRR234.3(d)(1), the following definitions specified under 6NYCRR234.2 apply:
(b)(1) Alcohol. Ethanol (CAS # 64-17-5), n-propanol (CAS # 71-23-8), and isopropanol (CAS # 67-63-0).
(b)(2) Alcohol substitute. A non-alcohol additive that contains VOC and is used in a fountain solution to reduce the surface tension of water or to prevent piling (ink build-up).
(b)(3) As applied. The VOC concentration of the alcohol (or alcohol substitute) concentration of a fountain solution at the time it is applied to lithographic press plates.

As per 6 NYCRR 234.7, 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 requirement. In addition, the results of an analysis or other procedure used to establish compliance with this requirement must be provided to the department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310

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 21: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement:6 NYCRR 234.3 (d) (1) (i) ('a')

Item 21.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-10000

Process: 002

Emission Source: 40002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

An offset lithographic printing process that uses fountain solutions containing VOC shall not operate if it is located in a severe ozone non-attainment area or is located at a facility with total actual annual VOC graphic arts emissions of three tons or more on a 12-month rolling basis, unless for heat-set web offset lithographic printing processes the fountain solution as applied contains no more than 1.6 percent alcohol by weight or equivalent.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FOUNTAIN SOLUTION

Parameter Monitored: ALCOHOL

Upper Permit Limit: 1.6 percent alcohol by weight

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 22: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement:6 NYCRR 234.3 (d) (1) (i) ('b')

Item 22.1:



The Compliance Demonstration activity will be performed for the Facility.

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

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

An offset lithographic printing process that uses fountain solutions containing VOC shall not operate if it is located in a severe ozone non-attainment area or is located at a facility with total actual annual VOC graphic arts emissions of three tons or more on a 12-month rolling basis, unless for heat-set web offset lithographic printing processes the fountain solution as applied contains no more than 3.0 percent alcohol by weight when the fountain solution is refrigerated to less than 60 degrees Fahrenheit (60°F) or 15.5 degrees Celsius (15.5°C).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FOUNTAIN SOLUTION

Parameter Monitored: ALCOHOL

Upper Permit Limit: 3.0 percent alcohol by weight

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 23: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement:6 NYCRR 234.3 (d) (1) (ii) ('a')

Item 23.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-10000
Process: 001 Emission Source: 10002

Emission Unit: A-10000
Process: 001 Emission Source: 80001

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

Item 23.2:

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

An offset lithographic printing process that uses fountain solutions containing VOC shall not operate if it is located in a severe ozone non-attainment area or is located at a facility with total actual annual VOC graphic arts emissions of three tons or more on a 12-month rolling basis, unless, for sheet-fed offset lithographic printing processes, the fountain solution as applied contains no more than five percent alcohol by weight or equivalent.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FOUNTAIN SOLUTION

Parameter Monitored: ALCOHOL

Upper Permit Limit: 5.0 percent alcohol by weight

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 24: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement: 6 NYCRR 234.3 (d) (1) (ii) ('b')

Item 24.1:

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

Emission Unit: A-10000

Process: 001

Emission Source: 10002

Emission Unit: A-10000

Process: 001

Emission Source: 80001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

An offset lithographic printing process that uses fountain solutions containing VOC shall not operate if it is located in a severe ozone non-attainment area or is located at a facility with total actual annual VOC graphic



arts emissions of three tons or more on a 12-month rolling basis, unless, for sheet-fed offset lithographic printing processes, the fountain solution as applied contains no more than 8.5 percent alcohol by weight when the fountain solution is refrigerated to less than 60 degrees Fahrenheit (60°F) or 15.5 degrees Celsius (15.5°C).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FOUNTAIN SOLUTION

Parameter Monitored: ALCOHOL

Upper Permit Limit: 8.5 percent alcohol by weight

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 25: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement: 6 NYCRR 234.4 (a)

Item 25.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-10000

Process: 002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Printing processes that use control equipment to comply with the provisions of Part 234 must test and monitor the control equipment to ensure the overall removal efficiency. Test methods included in this section must be used to demonstrate the overall removal efficiency.

(1) For control equipment that uses VOC/solvent recovery, overall removal efficiency must be demonstrated using methods described in paragraphs (b)(1) and (2) of 6 NYCRR Part 234.4.

(2) For control equipment other than VOC/solvent recovery, the chosen demonstration method must include provisions to determine the overall removal efficiency.



Dual Print and Mail LLC may determine overall removal efficiency without conducting a capture efficiency test of the system by demonstrating that the pressure in the heat-set press dryer is negative relative to the surrounding press room and that the direction of airflow is "into the dryer". Negative dryer pressure shall be established during the RTO performance test using an airflow direction indicator, such as a smoke stick or aluminum ribbons, or differential pressure gauge. If the dryer is operated at negative pressure, the capture efficiency for VOC from the heat-set lithographic inks and varnishes (coatings) formulated with low volatility ink oils can be assumed to be 100 percent of the VOC (ink oils) volatilized in the dryer.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 26: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement: 6 NYCRR 234.4 (b)

Item 26.1:

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

Emission Unit: A-10000
Process: 002

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

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a printing process subject to this Part must follow notification requirements and test procedures in Part 202-1 of this Title.

One of the following test methods from appendix A of 40 CFR 60 (see Table I, 6 NYCRR Part 200.9) must be used to measure the VOC concentration of a gas stream at the inlet and outlet of the control equipment:

(i) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;

(ii) Method 25, Determination of Total Gaseous Non-methane



Organic Emissions as Carbon; or

(iii) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

(iv) Methods not listed above must be approved in advance by the Department and the United States Environmental Protection Agency.

Acceptable analytical methods for determining the VOC content, water content, density, volume of solids and weight of solids of surface coatings and printing inks are presented in appendix A, methods 24 and 24A (as appropriate), of 40 CFR 60 (see Table 1, 6 NYCRR Part 200.9). Alternate analytical methods for surface coating and printing ink analysis must be approved by the Department and the United States Environmental Protection Agency. Instead of analytical methods, the Department may accept the manufacturer's certification of VOC content of ink coating or adhesives, if supported by actual batch records.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 27: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement: 6 NYCRR 234.4 (c)

Item 27.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Continuous control equipment monitors for the following parameters must be installed, periodically calibrated, and operated at all times that the associated control equipment is operated:

(1) Combustion zone temperature of all oxidizers;

(2) Inlet temperature at the catalytic oxidizer bed;

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



(3) Break-through of VOC on a carbon adsorption unit;
and

(4) Any other continuous monitoring or recording device
required by the Department.

Monitoring Frequency: CONTINUOUS
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 28: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement: 6 NYCRR 234.5

Item 28.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 28.2:
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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Condition 29: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement:6 NYCRR 234.6

Item 29.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To reduce unnecessary VOC emissions to the environment, Dual Print and Mail LLC shall comply with the following handling, storage and disposal requirements specified in this Part for VOC containing products used throughout the facility for graphic art operations and associated activities.

(1) all containers used to store or dispose of cloth or paper impregnated with VOCs or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive shall be covered with a tight fitting lid and kept closed, except momentarily, when adding or removing materials and/or soiled towels/cloths;

(2) spent or fresh VOC or solvents to be used for surface preparation, cleanup, or the removal of ink, coating or adhesive shall be stored in closed containers with tight fitting lids; and

(3) open containers shall not be used to store, dispose or dispense ink, coating, or adhesives 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, coating or adhesive to a substrate.

Signs detailing these requirements shall be posted conspicuously, at all times, in all solvent/waste storage room(s) and any other location where VOC containing compounds are handled or disposed. All employees involved with these activities shall be properly trained in good housekeeping and work practices that result in the minimization of air pollution and shall be familiar with the requirements of this permit, which shall be reemphasized monthly during staff meetings. All records of disposal shall be maintained onsite. Compliance with this requirement satisfies the good housekeeping



requirements specified in this permit under the 49.0 tpy capping condition for VOCs under 6NYCRR 201-7.1.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 30: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement:6 NYCRR 234.7

Item 30.1:

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

Emission Unit: A-10000

Item 30.2:

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: UPON REQUEST BY REGULATORY AGENCY

Condition 31: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable Federal Requirement:6 NYCRR 234.8

Item 31.1:

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



Emission Unit: A-10000	Emission Point: 00001
Emission Unit: A-10000	Emission Point: 00002
Emission Unit: A-10000	Emission Point: 00003
Emission Unit: A-10000	Emission Point: 00004
Emission Unit: A-10000	Emission Point: 00005

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

Item 31.2:

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.

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.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



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.

Compliance with these monitoring requirements will ensure compliance with 6NYCRR211.2 and 6NYCRR212-1.6(a) opacity requirements specified elsewhere in this permit. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Reference Test Method: USEPA Reference 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 32: Contaminant List
Effective between the dates of 12/30/2015 and 12/29/2025



Applicable State Requirement: ECL 19-0301

Item 32.1:

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

CAS No: 000067-56-1
Name: METHYL ALCOHOL

CAS No: 000079-10-7
Name: 2-PROPENOIC ACID

CAS No: 000091-20-3
Name: NAPHTHALENE

CAS No: 000098-82-8
Name: BENZENE, (1-METHYLETHYL)

CAS No: 000100-42-5
Name: STYRENE

CAS No: 000107-21-1
Name: 1,2-ETHANEDIOL

CAS No: 000110-80-5
Name: ETHANOL, 2-ETHOXY-

CAS No: 000111-42-2
Name: ETHANOL, 2,2'-IMINOBIS-

CAS No: 000111-90-0
Name: ETHANOL, 2- (2-ETHOXYETHOXY)

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

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

CAS No: 0NY075-00-5
Name: PM-10

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

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

**Condition 33: Malfunctions and start-up/shutdown activities
Effective between the dates of 12/30/2015 and 12/29/2025**



Applicable State Requirement:6 NYCRR 201-1.4

Item 33.1:

(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 34: Emission Unit Definition
Effective between the dates of 12/30/2015 and 12/29/2025**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 34.1:

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

Emission Unit: A-10000

Emission Unit Description:

This emission unit contains cold-set and heatset lithographic printing operations including direct to plate pre-press operations, offset sheet-fed and web



lithographic printing presses and associated activities and post-press operations. VOC and HAP emissions generated by these activities, come from inks, fountain solution, developers, solvent based cleaners, blanket wash, toners, adhesives, degreasers, and other products used throughout the facility at various emission sources (ES) and processes. Cold-set and heat-set lithographic printing operations contained in EU A-10000 are identified as Process 001 and Process 002, respectively. Emission Sources contained in this Emission Unit include two cold-set sheet-fed offset lithographic presses: (1) 10-Color press identified as ES 10002 and (1) 8-Color press identified as ES 80001; one 4-Color heat-set web offset lithographic press identified as ES 40002; press cleaning operations, identified as BWO01, BW002 and BW003; digital and conventional pre-press operations, identified as ES PRE01; and various post-press operations identified as ES POST1. Most of the volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) from the inks and fountain solution emitted from ES 40002 during printing are captured and destroyed via the Megtec Dual-Dry TNV 119 Integrated Air Flotation Dryer and Oxidizer, identified as Emission Source Control (ESC) RTO01. The dryer operates at 575 degrees F and maintains a negative pressure of -0.3 in water to capture VOC emissions from the printing process. Based on the manufacturer's specifications, the recuperative thermal oxidizer (RTO) has a 95% destruction efficiency at the required minimum combustion chamber temperature of 1400 degrees F and residence time of 0.845 second. The software for ES Control RTO01 monitors the dryer pressure and the combustion chamber temperature and stops the press if any of these operating requirements are not met. Lithographic presses ES 10002 and ES 80001 are each equipped with automatic blanket wash units (ES BW002). The cleaning of the heat-set press using a Baldwin IMPACT Auto Blanket & Impression Cleaning System with a Prepac Roll is identified as ES BW003. Manual cleaning of the heat-set and/or cold-set presses and/or other equipment with solvents and towels is identified as ES BWO01. The VOCs, HAPs and particulates from ES 10002 and ES 80001 are exhausted to the outdoor air via emission points (EP) 0001 and EP 0002, respectively. ES 10002 and ES 80001 are equipped with an infrared heater located at the delivery end of each press to shorten drying time. The exhaust hoods associated with EP 0001 and EP 0002 are each equipped with a 65% efficient filter, identified as ESC CTRL1 and ESC CTRL2, respectively, for the removal of particulates generated by the application of spray powder during the printing process. Fugitive VOCs, HAPs and particulates from graphic art activities are emitted to the ambient air through EP 0003 and EP 0004, equipped with particulate filters ESC CTRL3 and CTRL4, respectively,



seven general building vents and other building openings.
Dual Print and Mail LLC disposes of spent blanket wash and waste ink offsite, as necessary.

Building(s): 1

Condition 35: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable State Requirement:6 NYCRR 201-5.1 (a) (1)

Item 35.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 35.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

The Megtec Dual-Dry TNV 119 Integrated Air Flotation Dryer and Oxidizer is programmed to shutdown the printing press if the dryer pressure becomes positive for more than 60 seconds or the temperature of the combustion chamber falls below 1400 degrees Fahrenheit for more than 15 minutes. In accordance with the Preventative Maintenance, Operating and Emergency Shutdown Plan, at times when the dryer/RTO shuts down during the printing process due to problems with the dryer/RTO such as malfunction, failure to maintain 1400 degree F, failure to maintain negative pressure, insufficient residence time, etc., Dual Print and Mail LLC shall record in a permanently bound logbook or electronically via the data management system all pertinent details including, but not limited to, the cause, dryer pressure and RTO temperature readings at time of shutdown and the corrective action(s) taken. A summary of these incidences shall be maintained onsite and shall be available for review by NYSDEC representatives upon request. These records and all supporting documentation shall be kept onsite. All electronic data must be backed up daily and stored on a secure server.



Operation of the dryer and RTO in accordance with this requirement allows the use of 95% destruction efficiency for the RTO and 100% capture efficiency for the dryer in the calculation of VOC emissions from the inks, coatings and varnishes used with the heat-set lithographic printing press to determine compliance with the 49.0 tpy limit on facility-wide VOC emissions. Continuous monitoring and recording of RTO temperature and dryer pressure is required as specified elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 36: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable State Requirement: 6 NYCRR 201-5.1 (a) (1)

Item 36.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 36.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The minimum temperature required to achieve 95% destruction of the VOCs in the combustion chamber of the RTO is 1400 degrees Fahrenheit at a minimum residence time of 0.845 second, based on the manufacturer's guarantee. To verify compliance with the minimum temperature requirement, the combustion chamber temperature must be continuously monitored and recorded. The continuous temperature recorder shall be installed, operated, calibrated and maintained in accordance with this permit and the manufacturer's recommendations. Original recorder charts and/or electronic data showing continuous monitoring and recording of the combustion chamber operating temperature and records of calibration, maintenance and repair shall be kept onsite. All electronic data shall be stored securely and backed up on a daily basis. Dual Print and Mail LLC shall include a certified statement in the Annual Compliance Certification Report indicating that all requirements as specified in this condition have been fulfilled during the calendar year. Any deviations shall be reported.

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



Operation of the RTO in accordance with this requirement allows the use of 95% destruction efficiency in the calculation of VOC emissions from the inks, coatings and varnishes used with the heat-set lithographic printing press to determine compliance with the 49.0 tpy limit on facility-wide VOC emissions.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1400 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 37: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable State Requirement: 6 NYCRR 201-5.1 (a) (1)

Item 37.1:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 37.2:
Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:
Dual Print and Mail LLC must operate the RTO at 1400 degrees Fahrenheit with a residence time of at least 0.845 second to allow the use of 95% destruction efficiency in the calculation of VOC emissions from the inks, coatings and varnishes used with the heat-set lithographic printing press to determine compliance with the 49.0 tpy limit on facility-wide VOC emissions. Continuous monitoring and recording of RTO temperature is required as specified elsewhere in this permit.

Parameter Monitored: DESTRUCTION EFFICIENCY
Lower Permit Limit: 95 percent reduction by weight
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Condition 38: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

Applicable State Requirement:6 NYCRR 201-5.1 (a) (1)

Item 38.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 38.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Dual Print and Mail LLC must maintain the dryer at a minimum vacuum pressure of -0.3 inches of water to allow the use of 100% capture efficiency when calculating VOC emissions from the inks, coatings and varnishes used with the heat-set lithographic printing operation to determine compliance with the 49.0 tpy limit on facility-wide VOC emissions. Continuous monitoring and recording of dryer pressure is required. Records shall be maintained on site for a minimum of 5 years and shall be available for review by NYSDEC representatives upon request.

Parameter Monitored: VACUUM
Upper Permit Limit: 0.3 inches of water
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 39: Renewal deadlines for state facility permits
Effective between the dates of 12/30/2015 and 12/29/2025

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

Item 39.1:

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 40: Compliance Demonstration
Effective between the dates of 12/30/2015 and 12/29/2025

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

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



Item 40.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 40.2:

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 41: Visible Emissions Limited

Effective between the dates of 12/30/2015 and 12/29/2025

Applicable State Requirement:6 NYCRR 211.2

Item 41.1:

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 42: Emission Point Definition By Emission Unit

Effective between the dates of 12/30/2015 and 12/29/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 42.1:

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

Emission Unit: A-10000

Emission Point: 00001

Height (ft.): 36

Length (in.): 16

Width (in.): 16



NYTMN (km.): 4757.668 NYTME (km.): 194.2 Building: 1

Emission Point: 00002
Height (ft.): 31 Length (in.): 12 Width (in.): 15
NYTMN (km.): 4757.668 NYTME (km.): 194.2 Building: 1

Emission Point: 00003
Height (ft.): 31 Diameter (in.): 12
NYTMN (km.): 4757.668 NYTME (km.): 194.2 Building: 1

Emission Point: 00004
Height (ft.): 31 Length (in.): 10 Width (in.): 12
NYTMN (km.): 4757.668 NYTME (km.): 194.2 Building: 1

Emission Point: 00005
Height (ft.): 34 Diameter (in.): 12
NYTMN (km.): 4757.612 NYTME (km.): 194.214 Building: 1

**Condition 43: Process Definition By Emission Unit
Effective between the dates of 12/30/2015 and 12/29/2025**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 43.1:

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

Emission Unit: A-10000
Process: 001 Source Classification Code: 4-05-004-33

Process Description:

This process consists of offset lithographic printing operations in which cold-set inks are applied to paper substrate (Emission Sources 10002 and 80001). 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. The cold-set lithographic presses are equipped with automatic systems that use solvent (blanket wash) to clean the presses, identified as ES BW002. They are also cleaned manually at times with a solvent (blanket wash) and shop towels, identified as ES BWO01.

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

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

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

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

New York State Department of Environmental Conservation

Permit ID: 9-1430-00310/00001

Facility DEC ID: 9143000310



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

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

Emission Source/Control: BW002 - Process

Emission Source/Control: BWO01 - Process

Item 43.2:

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

Emission Unit: A-10000

Process: 002

Source Classification Code: 4-05-004-21

Process Description:

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

Emission Source/Control: RTO01 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 40002 - Process
Design Capacity: 2,125 feet per minute

Emission Source/Control: BW003 - Process

Emission Source/Control: BWO01 - Process

