

New York State Department of Environmental Conservation
Facility DEC ID: 2610100016



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 2-6101-00016/00004
Mod 0 Effective Date: 10/22/2001 Expiration Date: 10/21/2006
Mod 1 Effective Date: 12/11/2003 Expiration Date: 10/21/2006

Permit Issued To: N A P INDUSTRIES INC
667 KENT AVENUE
BROOKLYN, NY 11211-7530

Contact: MORRIS LOWY
NAP INDUSTRIES INC
667 KENT AVENUE
BROOKLYN, NY 11211-7530
(718) 625-4948

Facility: NAP - KENT AVENUE FACILITY
667 KENT AVE
BROOKLYN, NY 11211-7530

Contact: MORRIS LOWY
NAP INDUSTRIES INC
667 KENT AVENUE
BROOKLYN, NY 11211-7530
(718) 625-4948

Description:

PERMIT DESCRIPTION
NAP Industries, Inc.
DEC ID # 2-6101-00016/00004

The original Title V permit for NAP Industries, Inc., DEC ID # 2-6101-00016/00004, was issued on 10/22/2001. In that permit, NAP Industries Inc, has replaced a flexographic printing press, P4 (Beta 808 Press, 8-color, 50 inches & Emission Source: 000P4) with another flexographic printing press, P4A (CMF Omat Press, 8-color, 50 inches & Emission Source: 00P4A). The P4 printing press (original CMF Beta 808) was disconnected on 3/30/2001 and was no longer in service, but it could only run with the approval by NYSDEC for demonstration to a potential buyer.

This is a minor permit modification to reinstate or to reactivate flexographic printing press P4 (original



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CMF Beta 808 8-color, 50 inches, Emission Source: 000P4) that was initially constructed on 1/1/1996, permitted and began operating on 1/1/1996, but was disconnected on 3/30/2001 and was removed from the permit and used as an offset for a new printing press installation (newer model), Press P4A (CMF Omat Press, 8-color, 50 inches & Emission Source: 00P4A). In order to compensate/offset the VOC emissions for the reactivation of P4, NAP Industries has sold and permanently removed from the facility on 3/25/2002, flexographic printing press P1 (Kidder, 6-color, 36 inches & Emission Source: 000P1) that began operating on 2/01/1975. The facility is planning to begin operating this Beta 808 press upon the issuance of this Title V modification, which is expected around 12/31/2003.

The facility creates VOC emissions that are currently processed through a natural gas- fired catalytic oxidizer with a VOC RACT variance, operating between April 1 and October 31, with a destruction efficiency of 90% before emitting to the environment.

In order to remain below the threshold of new emissions that would require the facility to be subject to the New Source Review, 6 NYCRR 231-2, NAP Industries, Inc. will increase the use of the facility's oxidizer (from 7 months to 8 months) under its RACT seasonal variance and commit to a federally enforceable cap on operating hours (6916 hours/year instead of 8760 hours/year).

This permit modification does not add, remove or change in any way the applicable and pertinent regulations of the existing Title V permit, including record keeping and reporting requirements.

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: JOHN F CRYAN
 DIVISION OF ENVIRONMENTAL PERMITS
 ONE HUNTERS POINT PLAZA, 47-40 21ST STREET
 LONG ISLAND CITY, NY 11101-5407

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 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 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

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Relationship of this Permit to Other Department Orders and Determinations

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Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal-REGION 2

HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions

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 1-1: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 1-1.1:

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 1-1.2:

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 1-1.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute,



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regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Expired by Mod No: 1

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.

Condition 1-2: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 1-2.1:

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

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

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Expired by Mod No: 1

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.



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

Condition 5: Submission of Applications for Permit Modification or Renewal-REGION 2 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 2 Headquarters
Division of Environmental Permits
1 Hunters Point Plaza, 4740 21st Street
Long Island City, NY 11101-5407
(718) 482-4997



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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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667 KENT AVE
BROOKLYN, NY 11211-7530

Authorized Activity By Standard Industrial Classification Code:
2673 - BAGS: PLASTICS, LAMINATED AND COATED
2759 - COMMERCIAL PRINTING, NEC
3081 - UNSUPPORTED PLASTICS FILM AND SHEET

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FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Sealing - 6NYCRR Part 200.5

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

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

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

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

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

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

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

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

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

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

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

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

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the

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emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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requirements, regulations, or law.

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

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

Item K: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

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

Item L: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item M: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission

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Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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

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

Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted

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facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

Item U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)

No permit revision will be required for operating changes that contravene an express permit term, provided that such

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changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

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

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the

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Act;

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

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

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

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

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

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

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

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

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

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a shorter time period in the case of an emergency.

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

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

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item AA: Open Fires - 6 NYCRR Part 215

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

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



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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 subject to annual compliance certification requirements for Title V permits only.

Condition 27: Emission Unit Definition
Effective between the dates of 10/22/2001 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 201-6

Item 27.1(From Mod 1):

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

Emission Unit: 0-00CFI

Emission Unit Description:

Five (5) Central Impression Cylinder (CIC) flexographic printing presses comprising Emission Unit 0-00CFI are used to print on polyethylene substrate. Emissions from each printing press are ducted/directed commonly to a gas-fired catalytic oxidizer to destroy the VOC during the period from April 1 to October 31 yearly (ozone season - Process P01), operating under a seasonal variance from using the catalytic oxidizer between November 1 and March 31. The catalytic oxidizer is not operated during the remaining part of the year (November 1 to March 31) as per the RACT variance granted under 6 NYCRR Part 234.3(f)(3). When the catalytic oxidizer is not being used between November 1 and March 31 yearly (non-ozone season - Process P02), the emissions from each press (the same five presses) are bypassing the catalytic oxidizer and are individually vented through individual emission points directly to the atmosphere. Process P01 is now being modified to be increased from a 7-month period to an 8-month period between March 1 and October 31 in order to remain below the threshold of new emissions that would require the facility to be subject to New Source Review, 6 NYCRR 231-2. Subsequently, Process P02 is now being modified to



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be decreased from a 5-month period to a 4-month period between November 1 and February 28.

Nap Industries, Inc. has the following five printing presses:

Printing Press Point	Printing Source	Printing Press ID	Emission	Emission
Kidder 000P1 (removed 3/25/2002)		P1	00001	
Prestige 806 000P2		P2	0002A	
Prestige 806		P2	0002B	000P2
Mirage 806 000P3		P3	0003A	
Mirage 806 000P3		P3	0003B	
CMF Beta 808 (original) (to be reconnected)		P4	000P4	000P4
CMF Omat 808 (first)		P5	000P5	000P5
Omat 808 (second)		P4A	00008	00P4A
Oxidizer (Emission Control)			00007	00001

Building(s): MAIN/ROOF

Condition 1-1: Recordkeeping and reporting of compliance monitoring Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 1-1.1:

Records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;

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control procedures

if required;

(v) The results of such analyses including quality assurance data where required; and

(vi) The operating conditions as existing at the time of sampling or measurement.

l reports. Reports

must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 1-2: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 1-2.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at plication. Support information includes all calibration and maintenance records and all original strip-chart recordings for red by the permit.

Condition 1-3: Compliance Certification

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 1-3.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-3.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

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Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for

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deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2004.
Subsequent reports are due every 6 calendar month(s).

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Condition 29: Compliance Certification
Effective between the dates of 10/22/2001 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Compliance certifications shall contain the following information:

- the identification of each term or condition of the permit that is the basis of the certification;
- the compliance status;
- whether compliance was continuous or intermittent;
- the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
- such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
- and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA



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representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Hunters Point Plaza
47-40 21st Street
Long Island City, NY 11101-5407

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring
and Enforcement
625 Broadway
Albany, NY 12233-3258

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2002.
Subsequent reports are due on the same day each year

Condition 1-4: Non Applicable requirements
Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(g)

Item 1-4.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

(From Mod 1) 6NYCRR 212.7(p)

Emission Unit: 000CFI Process: P01

Reason: The exception states that "Graphic arts processes subject to Part 234 of this Title or inks exempt from Part 234 pursuant to section 234.1(h) of this Title with respect to emissions of volatile organic compounds which are not given an "A" rating" are not subject to the provisions of 6 NYCRR 212.7."

Since New York City area is non-attainment for ozone, all VOCs emitted from NAP Industries, Inc. are environmentally



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rated "A" , since they contribute to ozone.

6NYCRR 212.7(p)

Emission Unit: 000CFI Process: P02

Reason: The exception states that "Graphic arts processes subject to Part 234 of this Title or inks exempt from Part 234 pursuant to section 234.1(h) of this Title with respect to emissions of volatile organic compounds which are not given an "A" rating" are not subject to the provisions of 6 NYCRR 212.7."

Since New York City area is non-attainment for ozone, all VOCs emitted from NAP Industries, Inc. are environmentally rated "A" , since they contribute to ozone.

6NYCRR 231-2.2

Reason: MINOR PERMIT MODIFICATION:

A minor permit modification is one that does not result in a net emissions increase. A net emissions increase is the project emission potential and every creditable emission increase. The project emission potential is the difference between prior actual annual emissions or prior allowable annual emissions, whichever is less, and the subsequent maximum annual potential of each such emission unit. A creditable emission increase is any increase from a physical change in, or a change in the method of operation and is qualified as the difference between prior actual annual emissions, or prior allowable annual emissions, whichever is less and the subsequent maximum annual potential. This permit modification does not add, remove or change in any way the applicable and pertinent regulations of the existing Title V permit, including record keeping and reporting requirements.

PROJECT DESCRIPTION:

The existing facility's potential emissions for volatile organic compounds (VOC) exceed the major source threshold which is 25 tons in non-attainment areas and ozone transport regions. This facility is located in a severe ozone area for volatile organic compounds (VOCs).

Printing Press	Printing	Emission	Emission
		Press ID	
Point Source			



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Kidder 000P1 (removed 3/25/2002)	P1	00001	
Prestige 806 000P2	P2	0002A	
Prestige 806	P2	0002B	000P2
Mirage 806 000P3	P3	0003A	
Mirage 806 000P3	P3	0003B	
CMF Beta 808 (original) (to be reconnected)	P4	000P4	000P4
CMF Omat 808 (first)	P5	000P5	000P5
Omat 808 (second)	P4A	00008	00P4A
Oxidizer (Emission Control)		00007	00001

In order to stay beneath (remain below) the threshold of new emissions that would require the facility to be subject to New Source Review, 6 NYCRR 231-2, NAP has removed the Kidder printing press, P1 (Emission Source/Control 000P1), and will re-install the CMF Beta Press, P4 (Emission Source/Control 000P4) and increase the use of the facility's oxidizer under its RACT seasonal variance and commit to a federally enforceable cap on operating hours.

The modification request now entails a cap on operating hours and an increase in the use of the catalytic oxidizer in order to meet the emission requirements. The facility will increase the use of the catalytic oxidizer from the current 7-month (between April 1 and October 31) to 8-month (between March 1 and October 31). The PTE is based on an operating schedule that calls for operation of 24 hours/day for Sunday through Thursday (120 hours), Fridays only until 1:00 pm (13- hour day), and closed all day Saturday. Total operating hours/week = 120 + 13 = 133 hours/week.

133 hours/week x 52 weeks/year = 6916 hours/year ; PTE factor = 8760/6916 = 1.267

Also, there will be a cap of 6916 operating hours per year, which is 133 hours/week.

DETERMINATION OF CONTEMPORANEOUS PERIOD:

The contemporaneous period for VOC in the severe ozone non-attainment area is five (5) calendar years ending in the calendar year that the new project commences

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operation. In this case, the reactivation of the CMF Beta 808 printing press will commence operating upon the issuance of this modified permit (about the end of December, 2003). Hence, the contemporaneous period is January 1, 1999 to December 31, 2003.

NETTING ANALYSIS:

The proposed modification is based on 2001 purchases and uses 83.5 TPY as the "past actual" emission for the combined 2000 and 2001 baseline, which is the Post-Control Actuals with RACT seasonal variance (oxidizer operating period). All the calculations are based on 90% VOC reduction during the period that the oxidizer is operating (RACT seasonal variance).

During the current 7-month operating with oxidizer (between April 1 and October 31). The current means operating the following printing presses (excluding P4): P1, P2, P3, P5 and P4A;

During the future 8-month operating with oxidizer (between March 1 and October 31). The future means operating the following printing presses (excluding P1): P2, P3, P4, P4A and P5;

Future Potential minus Past Actual (based on 8760 hours) =
Potential Post-Control - 4 month w/o oxidizer = $(150.75 - 83.5) = 67.25$ TPY

Future Actual minus past Actual with operating hours cap
(based on 6916 hours) = Actual Post-Control -
4-month w/o oxidizer = $(118.98 - 83.5) = 35.48$
TPY

Future Potential minus Past Actual (based on 8760 hours) =
Potential Post-Control - 4 month w/o oxidizer =
 $(126.93 - 83.5) = 43.43$ TPY

Future Actual minus past Actual (based on 6916 hours) =
Actual Post-Control - 4 month w/o oxidizer =
 $(100.18 - 83.5) = 16.68$ TPY

SUBPART 231-2 APPLICABILITY ANALYSIS:

The Facility Emission Potential (FEP) = 105.8 TPY
(Post-Control FEP) which is > Major Facility Size
Threshold (MFST) of 25 TPY.

The Maximum Annual Potential (MAP) for new project =
100.18 TPY

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The Significant Source Project Threshold (SSPT) = 2.5
TPY

The Project Emission Potential for EU: 0-00CFI =(MAP for
new project - prior actual annual emission) =

$$= (100.18 \text{ TPY} - 83.5 \text{ TPY}) = \\ 16.68 \text{ TPY}$$

The PEP is > SSPT of 2.5 TPY

The project emission potential (PEP) for this project for
the non-attainment VOC = 16.68 TPY

The Net Emission Increase (NEI) = PEP + Contemporaneous
increase - contemporaneous decrease

$$\text{NEI} = 16.68 \text{ TPY} + 0 - 0 = 16.68 \\ \text{TPY}$$

The NEI equals the PEP because there was no additional
emission increases or decreases during the five-year
contemporaneous period (January 1, 1999 to December 31,
2003).

The Net Emission Increase (NEI) is NOT > Significant New
Emission Increase Threshold (SNEIT), 16.68 TPY is NOT > 25
TPY. Therefore, this facility is NOT subject to Subpart
213-2.

CONCLUSION:

Based on the Subpart 231-2 Netting Analysis, since the Net
Emission Increase (NEI) is < Significant New Emission
Increase (SNEIT), then this facility is NOT subject to
Subpart 213-2.

Condition 31: Non Applicable requirements
Effective between the dates of 10/22/2001 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(g)

Item 31.1:

ified as being not

applicable to this facility and/or emission units, emission points, processes and/or emission sources within

quirements as non-

applicable.

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6NYCRR 212.7(p)

Emission Unit: 000CFI Emission Point: 00007 Process: P01 Source: 00001

Reason: THE EXCEPTION STATES THAT "GRAPHIC ARTS PROCESSES SUBJECT TO PART 234 OF THIS TITLE OR INKS EXEMPT FROM PART 234 PURSUANT TO SECTION 234.1(H) OF THIS TITLE WITH RESPECT TO EMISSIONS OF VOLATILE ORGANIC COMPOUNDS WHICH ARE NOT GIVEN AN A RATING " ARE NOT SUBJECT TO THE PROVISIONS OF 6 NYCRR 212.7.

6NYCRR 212.7(p)

Emission Unit: 000CFI Process: P02

Reason: THE EXCEPTION STATES THAT "GRAPHIC ARTS PROCESSES SUBJECT TO PART 234 OF THIS TITLE OR INKS EXEMPT FROM PART 234 PURSUANT TO SECTION 234.1(H) OF THIS TITLE WITH RESPECT TO EMISSIONS OF VOLATILE ORGANIC COMPOUNDS WHICH ARE NOT GIVEN AN A RATING " ARE NOT SUBJECT TO THE PROVISIONS OF 6 NYCRR 212.7.

6NYCRR 231-2

Emission Unit: 000CFI

Reason: On December 30, 1996, NAP Industries received a permit for adding a new CMF 8-color printing press (fifth press). Prior to NYSDEC issuing that permit, the data was analyzed and calculations were performed and it was concluded that there was no increase in MAP (maximum annual potential) and NAP Industries was not subject to Part 231-2 (New Source Review) requirements.

The permit provided that all the presses in the press room are to be contained in a "total enclosure" as defined by USEPA guidelines and satisfies EPA Method 204 and the emissions would be controlled by the incinerator which was later stack tested using EPA Method 204 and proved an overall removal efficiency in excess of 90%. The facility is to operate under the same conditions as the conditions under which the stack testing was conducted.

6NYCRR 231-2

Reason: On December 30, 1996, NAP Industries received a permit for adding a new CMF 8-color printing press (fifth press). Prior to NYSDEC issuing that permit, the data was analyzed and calculations were performed and it was concluded that there was no increase in MAP (maximum annual potential) and NAP Industries was not subject to Part 231-2 (New

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Source Review) requirements.

The permit provided that all the presses in the press room are to be contained in a "total enclosure" as defined by USEPA guidelines and satisfies EPA Method 204 and the emissions would be controlled by the incinerator which was later stack tested using EPA Method 204 and proved an overall removal efficiency in excess of 90%. The facility is to operate under the same conditions as the conditions under which the stack testing was conducted.

Condition 33: Compliance Certification
Effective between the dates of 10/22/2001 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 33.1:

The Compliance Certification activity will be performed for the Facility.

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

Condition 34: Recordkeeping requirements
Effective between the dates of 10/22/2001 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 34.1:

(a) The following records shall be maintained for at least five years:

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

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Condition 1-5: Compliance Certification

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 234.4(b)(3)

Item 1-5.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 1-5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Ink and solvent purchases and/or usage will be recorded monthly on a computer spread sheet. All HAPs components of ink in formulations will be recorded. Records will be maintained at the facility for a period of five years. Purchases and/or usage will be tracked and emissions will be recorded with and without add-on controls.

The facility should record the amount of HAPs used and the emissions of HAPs (taking into account the destruction efficiency of the catalytic oxidizer) during the RACT seasonal variance period and during the non- RACT seasonal variance period. The HAPs emissions can be calculated using the two following formulas:

During the RACT seasonal variance period, when the catalytic oxidizer is not operational (Process P02), from November 1 through February 28):

Monthly HAPs usage = the summation of [the % by weight of HAPs in each product used X the amount used of each product containing HAPs]

During the non-RACT seasonal variance period, when the catalytic oxidizer is operational (Process P01), from March 1 through October 31):

Monthly HAPs usage = the summation of [the % by weight of HAPs in each product used X the amount used of each product containing HAPs] X [100 - % of the catalytic oxidizer's destruction efficiency/100]



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An overall catalytic oxidizer's destruction efficiency of 90% for this facility shall be used for purposes of calculating HAPs and VOC emission when the control system is operating.

Records of purchases and/or usage of inks, thinners and any solvent or material containing hazardous air pollutants (HAPs) must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the Department's representative. In addition, any other information required to determine compliance with 6NYCRR Part 234 must be provided to the commissioner's representative in a format acceptable to the Department. These records must be maintained at the facility for a period of five years.

The facility shall maintain the following records for each ink, cleaning solvent, and other HAPs used in the printing process, on a monthly and yearly basis:

1. The brand and product name or code for the inks, thinners and solvents and any other material containing HAPs.
2. The quantity of the inks, thinners and solvents and any other material containing HAPs used during the calendar month and year.
3. The HAP content of the inks, thinners and solvents and any other material containing HAPs.

In addition, copies of all purchase orders, invoices, and other documents for supplies and equipment that are used to support the monthly and the yearly log are to be kept on site. As specified in 6NYCRR Part 201-6.5(c)(3), NAP Industries, Inc. is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of instances of deviations from these requirements.

Upon written request from the Department, NAP Industries, Inc. shall report or make available monthly recordkeeping to demonstrate compliance.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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The initial report is due 1/30/2004.
Subsequent reports are due every 6 calendar month(s).

Condition 1-6: Compliance Certification
Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 234.4(b)(3)

Item 1-6.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 1-6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Ink and solvent purchases and/or usage will be recorded monthly on a computer spread sheet. All VOC components of ink in formulations will be recorded. Records will be maintained at the facility for a period of five years. Purchases and/or usage will be tracked and emissions will be recorded with and without add-on controls.

The facility should record the amount of VOC used and the emissions of VOC (taking into account the destruction efficiency of the catalytic oxidizer) during the RACT seasonal variance period and during the non- RACT seasonal variance period. The VOC emissions can be calculated using the two following formulas:

During the RACT seasonal variance period, when the catalytic oxidizer is not operational (Process P02), from November 1 through February 28):

Monthly VOC usage = the summation of [the % by weight of VOC in each product used X the amount used of each product containing VOC]

During the non- RACT seasonal variance period, when the catalytic oxidizer is operational (Process P01), March 1 through October 31):

Monthly VOC usage = the summation of [the % by weight of VOC in each product used X the amount used of each product containing VOC] X [100 - % of the catalytic

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oxidizer's destruction efficiency/100]

An overall catalytic oxidizer's destruction efficiency of 90% for this facility shall be used for purposes of calculating HAPs and VOC emission when the control system is operating.

Records of purchases and/or usage of inks, volatile organic compounds (VOC) and solvents must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the Department's representative. In addition, any other information required to determine compliance with 6NYCRR Part 234 must be provided to the commissioner's representative in a format acceptable to the Department. Records must be maintained at the facility for a period of five years.

The facility shall maintain the following records for each ink, cleaning solvent, and other VOC used in the printing process, on a monthly and yearly basis:

1. The brand and product name or code for the inks, thinners and solvents and any other material containing VOC.
2. The quantity of the inks, thinners and solvents and any other material containing VOC used during the calendar month and year.
3. The VOC content of the inks, thinners and solvents and any other material containing VOC.

In addition, copies of all purchase orders, invoices, and other documents for supplies and equipment that are used to support the monthly and the yearly log are to be kept on site. As specified in 6NYCRR Part 201-6.5(c)(3), NAP Industries, Inc. is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of instances of deviations from these requirements.

Upon written request from the Department, NAP Industries, Inc. shall report or make available monthly recordkeeping to demonstrate compliance.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Reports due 30 days after the reporting period.
The initial report is due 1/30/2004.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 10/22/2001 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 234.6

Item 41.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following work practices are prohibited:

- (a) using open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or ink/coating removal;
- (b) storage in open containers of spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;
- (c) use of open containers to store or dispose of inks and/or surface coatings; or
- (d) use of open containers to store or dispense inks and/or surface coatings unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

To ensure that these work practices are not in use, the facility will conduct daily inspections for the presence of any open containers as described in the prohibitions above and maintain a log book of these inspections. Any such open containers shall be closed immediately. The log book should include the following information at a minimum:



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- date and time of inspection
- items or areas observed
- corrective measures taken, if necessary.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

Subsequent reports are due every 6 calendar month(s).

Condition 1-7: Compliance Certification

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 40CFR 63.829(d), Subpart KK

Item 1-7.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 1-7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

NAP Industries, Inc. shall demonstrate that its emissions are below the 10 tons per year of any individual HAP and below the 25 tons per year of total HAPs based on a 12-month rolling average by maintaining records of all required measurements and emission calculations of individual HAP and total HAPs. This facility is a minor and not a major source of HAPs. However, this facility is a major source of VOC.

To demonstrate that this facility will continue to be a minor of HAP, the owner or operator shall maintain records of all required measurements and emissions calculations of individual HAP and total HAPs from all activities at the facility.

These records shall be kept on a monthly basis, and shall include the mass of all HAP-containing materials used during the month, and the mass fraction of HAP present in each HAP-containing material used. Please see Condition 3 1-6 that is associated with 6 NYCRR 234.4(b)(3) for keeping records of HAPs.

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The facility shall maintain records of ink, thinner and solvent purchases and/or usages and HAP components on a monthly basis. HAP components of ink formulations will be recorded. Purchase and/or usage will be tracked and emissions will be recorded with and without add-on controls. An overall reduction efficiency of 90% shall be used for purposes of calculating VOC emission when the control system is operating. These records, including the calculations used to determine the emissions, shall be retained on site for a period of at least five years and shall be available for inspection by NYSDEC and/or USEPA inspectors during normal business hours.

The major source thresholds :

individual HAP: 10.0 tons per rolling 12-month period

total HAPs: 25.0 tons per rolling 12-month period

This facility shall demonstrate that its emissions are below the 10 tons per year of any individual HAP and below the 25 tons per year of total HAPs based on a 12-month rolling average by maintaining records of all required measurements and emission calculations of individual HAP and total HAPs. This facility is a minor and not a major source of HAPs. However, this facility is a major source of VOC.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2004.

Subsequent reports are due every 6 calendar month(s).

Condition 1-8: Accidental release provisions.

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 40CFR 68

Item 1-8.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than 100 lbs, the following provisions will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;



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; if such quantities

are present at the time of permit issuance:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

f 40 CFR Part 68,

including the registration and submission of the Risk Management Plan. Information should be submitted to:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866
ATTN: Accidental Release Program contact

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

**Condition 43: Emission Point Definition By Emission Unit
Effective between the dates of 10/22/2001 and 10/21/2006**

Applicable Federal Requirement: 6NYCRR 201-6

Item 43.1(From Mod 1):

ted Emission Unit:

Emission Unit:	0-00CFI		
Emission Point:	00001		
Height (ft.):	31	Diameter (in.):	14
NYTMN (km.):	4506.023	NYTME (km.):	587.633
		Building:	MAIN/ROOF
Emission Point:	00004		
Height (ft.):	39	Diameter (in.):	16
NYTMN (km.):	4506.023	NYTME (km.):	587.633
		Building:	MAIN/ROOF
Emission Point:	00005		
Height (ft.):	37	Diameter (in.):	18
NYTMN (km.):	4506.023	NYTME (km.):	587.633
		Building:	MAIN/ROOF
Emission Point:	00007		
Height (ft.):	53	Diameter (in.):	34
NYTMN (km.):	4506.023	NYTME (km.):	587.633
		Building:	MAIN/ROOF
Emission Point:	00008		
Height (ft.):	32	Diameter (in.):	18



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NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF

Emission Point: 0002A

Height (ft.): 33 Diameter (in.): 10

NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF

Emission Point: 0002B

Height (ft.): 38 Diameter (in.): 10

NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF

Emission Point: 0003A

Height (ft.): 33 Diameter (in.): 14

NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF

Emission Point: 0003B

Height (ft.): 39 Diameter (in.): 14

NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF

**Condition 44: Process Definition By Emission Unit
Effective between the dates of 10/22/2001 and 10/21/2006**

Applicable Federal Requirement: 6NYCRR 201-6

Item 44.1(From Mod 1):

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

Emission Unit: 0-00CFI

Process: P01

Source Classification Code: 4-05-003-11

Process Description:

Five flexographic printing presses used in Emission Unit 0-00CFI, Process P01, are used to print on packaging materials by applying solvent based inks to polyethylene sheeting. Emissions from the presses commonly duct/vent to a natural gas-fired catalytic oxidizer. The catalytic oxidizer operates under a RACT seasonal variance granted under 6 NYCRR Part 234.3(f)(3) and is utilized between April 1 and October 31 each year. The seasonal 7-month use of the catalytic oxidizer between April 1 and October 31 is proposed to be increased to 8-month period between March 1 and October 31 in order to remain below the threshold of new emissions that would require the facility to be subject to the New Source Review, 6 NYCRR 231-2.

Normal operations include a 6-day work week during this period. The operating schedule calls for operation of 24 hours/day for Sunday through Thursday (120 hours), Fridays only until 1:00 pm (13- hour day), and closed all day



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Saturday. Total operating hours/week = 120 + 13 = 133 hours/week.

Emission Source/Control: 00001 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 000P2 - Process
Design Capacity: 50 inches

Emission Source/Control: 000P3 - Process
Design Capacity: 50 inches

Emission Source/Control: 000P4 - Process Removal Date: 03/30/2001
Design Capacity: 50 inches

Emission Source/Control: 000P5 - Process
Design Capacity: 50 inches

Emission Source/Control: 00P4A - Process
Design Capacity: 50 inches

Item 44.2(From Mod 1):

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

Emission Unit: 0-00CFI

Process: P02

Source Classification Code: 4-05-003-11

Process Description:

The same five flexographic printing presses used in Emission Unit 0-00CFI, in Process P01, are used between November 1 and March 31 yearly (Process P02) under a RACT seasonal variance without the use of the catalytic oxidizer. The printing presses are used to print on packaging materials by applying solvent based inks to polyethylene sheeting. Each press has its own individual emission point, and the presses commonly duct/vent to the individual emission point between November 1 and March 31.

The five-month use of bypassing the catalytic oxidizer and venting directly to the atmosphere is being reduced to a four-month period between November 1 and February 28 in order to remain below the threshold of new emissions that would require the facility to be subject to the New Source Review, 6 NYCRR 231-2

Normal operations include a 6-day work week during this period. The operating schedule calls for operation of 24 hours/day for Sunday through Thursday (120 hours), Fridays only until 1:00 pm (13- hour day), and closed all day



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Saturday. Total operating hours/week = 120 + 13 = 133
hours/week.

Emission Source/Control: 000P2 - Process
Design Capacity: 50 inches

Emission Source/Control: 000P3 - Process
Design Capacity: 50 inches

Emission Source/Control: 000P4 - Process Removal Date: 03/30/2001
Design Capacity: 50 inches

Emission Source/Control: 000P5 - Process
Design Capacity: 50 inches

Emission Source/Control: 00P4A - Process
Design Capacity: 50 inches

**Condition 45: Part 212 exemption for graphic arts processes subject to
Part 234
Effective between the dates of 10/22/2001 and 10/21/2006**

Applicable Federal Requirement: 6NYCRR 212.7(p)

Item 45.1:

This Condition applies to Emission Unit: 0-00CFI

Item 45.2:

Emissions of volatile organic compounds not given an "A" environmental rating that are released from
pursuant to section
234.1(h)) are exempt from the provisions of 6NYCRR Part 212.

**Condition 46: VOL storage tanks less than 10000 gallons
Effective between the dates of 10/22/2001 and 10/21/2006**

Applicable Federal Requirement: 6NYCRR 229.1(b)(2)(iv)

Item 46.1:

This Condition applies to Emission Unit: 0-00CFI

Item 46.2:

The tank must be equipped with a conservation vent.

**Condition 1-9: Compliance Certification
Effective between the dates of 12/11/2003 and 10/21/2006**

Applicable Federal Requirement: 6NYCRR 234.3(e)



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Item 1-9.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Item 1-9.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 10 percent or greater for any consecutive six-minute period from any emission source subject to 6 NYCRR 234.

NAP Industries, Inc. shall perform the following:

1) Observe each stack once per day while the presses are operating for visible emissions. These observations must be conducted during the daylight hours except during adverse weather conditions (fog, rain or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded after each observation:

- weather conditions
- was a plume observed?

This logbook must be retained by the facility for five years after the date of the last entry.

3) If visible emissions are observed (other than steam - see below) on two consecutive days from a given stack(s), then a Method 9 analysis (based upon a six-minute mean) must be conducted for that stack(s) within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The Regional Air Pollution Control Engineer must be contacted with one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective action or further compliance schedules shall be presented to the Department for acceptance.

****NOTE**** Steam plumes generally form after stack gases leave the top of the stack. This is referred to as a



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detached plume. The distance between the stack and the beginning of the plume may vary, however, there is normally a distinctive distance between the stack and the plume. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Monitoring Frequency: DAILY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2004.

Subsequent reports are due every 6 calendar month(s).

**Condition 50: control requirement-other than VOC/solvent recovery
Effective between the dates of 10/22/2001 and 10/21/2006**

Applicable Federal Requirement: 6NYCRR 234.4(a)

Item 50.1:

This Condition applies to Emission Unit: 0-00CFI

Item 50.2:

When a printing process utilizes control equipment to comply with the provisions 6NYCRR Part 234, the overall removal efficiency.

For control equipment other than VOC/solvent recovery, this demonstration must include sequential destruction and/or removal of these air contaminants by control equipment prior to their release to the atmosphere.

**Condition 1-10: Compliance Certification
Effective between the dates of 12/11/2003 and 10/21/2006**

Applicable Federal Requirement: 6NYCRR 234.4(a)

Item 1-10.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



Item 1-10.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

At all times that any of the printing presses are in operation between March 1 and October 31, NAP Industries, Inc. shall satisfy the Permanent Total Enclosure requirement for the capture efficiency as specified in USEPA Method 204. The capture efficiency for VOC emissions from the printing operations is assumed to be 100% based on the results of the criteria test specified in Method 204 for Permanent Total Enclosures (PTE). A PTE is an enclosure that completely surrounds a source such that all volatile organic compound emissions are contained and directed to a control device. The Permanent Total Enclosures at the facility is the room containing the presses. The control device is a natural gas fired catalytic oxidizer which handles the emissions from all the printing presses from March 1 through October 31. The permit provides that all the presses in the press room are to be contained in a "total enclosure" as defined by USEPA guidelines and satisfy EPA Method 204 and that the emissions are controlled by the catalytic oxidizer, which was last stack tested on May 28, 1997, using EPA Method 204, and proved an overall removal efficiency of 91%. The facility is to operate under the same conditions as the conditions under which the stack testing was conducted. In accordance with the USEPA's "Guidelines for Determining Capture Efficiency" (1/9/95), an enclosure must meet certain criteria at all times during the printing operation to qualify as a Permanent Total Enclosure with 100% capture efficiency to assure the integrity of the total enclosure for the printing area, as follows:

(1) Any natural draft opening (NDO) must be at least 4 equivalent opening diameters from each VOC-emitting point. An "equivalent diameter" is the diameter of a circle that has the same area as the opening. The equation for equivalent diameter is specified in 40CFR51, Appendix M, Method 204, "Criteria for the Verification of a Permanent or Temporary Total Enclosure". For a circular NDO, the equivalent diameter equals the diameter of the opening.

(2) The total area of all NDO's shall not exceed 5

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percent of the surface area of the enclosure's walls, floor and ceiling.

(3) The average face velocity (FV) of air through all NDO's shall be at least 200 ft/min. The direction of air flow through all NDO's shall be into the enclosure.

(4) All access doors and windows whose areas are not included as NDO's and are not included in the calculation of FV shall be closed during routine operation of the printing process.

(5) All the exhaust gases from the enclosure are directed to the control device.

(6) Any doorways that are fitted with tightly overlapping vertical vinyl strips that extend to within a few inches of the floor shall be in place during routine operation of the printing process. The purpose of the barrier created by the hanging plastic strips and any other components of the enclosure (such as negative air pressure) to achieve 100 % capture efficiency is not compromised.

(7) The room is to be maintained at a negative static pressure relative to the rest of the building. Method 204 specifies that If the Permanent Total Enclosure criteria are not met, then the capture efficiency must be measured.

To maintain 100% capture efficiency, the presses shall be operated at all times under the same conditions that were applied during the last performance of Method 204 (stack test of May 28, 1997). All NDO's must be closed during printing presses operation except those NDOs which shall be enclosed with a plastic strip barrier. Any NDOs open during operation of the presses shall be considered a violation. If a violation occurs, the capture efficiency shall be measured based on the conditions observed at the time of the violation and utilized in the facility-wide VOC emissions calculations to determine compliance with the VOC emissions.

The capture efficiency for the VOCs emitted during the printing process should be 100% based on permanent total room enclosure of the presses with negative room pressure in accordance with Method 204. The emission unit controls VOC emissions to the ambient air via catalytic oxidizer



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with a 91 % destruction efficiency (as per the last stack test result of May 28, 1997). Reasonable steps shall be taken to maximize the capture of VOC emissions from the VOC sources. Overall reduction shall be the combined efficiency of capture of VOC and destruction in the catalytic oxidizer. Therefore, the overall reduction in volatile organic compounds (VOC) emissions as a result of the catalytic oxidizer shall be no less than 90%. An overall catalytic oxidizer's destruction efficiency of 90% for this facility shall be used for purposes of calculating HAPs and VOC emissions reduction when the control system is operating.

NAP Industries, Inc. must prepare VOC emission records based on the monthly purchases. Monthly VOC emissions shall be calculated based on monthly purchases and/or usage of ink, solvents, thinners and other VOC containing products, the VOC content of the products, 100% capture efficiency, and the 90% destruction efficiency of the catalytic oxidizer. The monthly emissions shall be used to compute the annual facility-wide VOC emissions using a rolling 12-month period (current monthly emissions added to the sum of the VOC emissions from the previous 11 months) on a monthly basis.

The facility is to operate under the same conditions as the conditions under which the last stack testing was conducted.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: INK, AS APPLIED, INCLUDING SOLVENTS
Parameter Monitored: VOC's

Lower Permit Limit: 100 percent

Reference Test Method: Method 204

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2004.

Subsequent reports are due every 6 calendar month(s).

Condition 1-11: Compliance Certification

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 234.3(a)



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Item 1-11.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-11.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Any time that any of the flexographic printing presses is operating between March 1 and October 31, the catalytic oxidizer must be started and allowed to reach operating temperature (minimum of 550 degrees Fahrenheit) prior to starting the presses. According to the Anguil Environmental Systems Operation and Maintenance Manual for the catalytic oxidizer, if the presses are started before the catalytic oxidizer is at operating temperature, the solvent laden air from the printing operation will be automatically aborted to the atmosphere until the catalytic oxidizer attains operating temperature and comes on line.

The inlet temperature to the catalytic oxidizer's bed (a minimum inlet temperature of 550 degrees Fahrenheit and a maximum of 950 degrees Fahrenheit) and the outlet temperature out of the catalytic oxidizer's bed (a minimum temperature of 550 degrees Fahrenheit) must be continuously monitored, recorded and calibrated according to the manufacturer's instructions and must be operated at all times that the catalytic oxidizer is operated which is whenever any of the printing presses are operating.

The catalyst shall be visually inspected, at a minimum semi-annually, or as needed during scheduled maintenance shutdowns, for the presence of trash, physical impurities or deterioration or coating on the catalyst. The inspector shall look for areas of discoloration on the catalyst, buildup of deposits, or signs that an area is being bypassed by the airflow. Before performing any physical inspections within the combustion or catalyst chambers, the system must be allowed to cool down

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naturally to a temperature close to the ambient. Typical maintenance procedures for catalytic oxidizers include catalyst cleaning at intervals between three and twelve months. Cleaning is usually accomplished by blowing clean compressed air through the catalyst element, by vacuuming, or by washing the element with water or a mild detergent that does not contain phosphates. Any catalyst maintenance program should include periodic inspections and maintenance of the oxidizer burner and control equipment. The proper operation of the high temperature alarm and burner shutdown systems are essential to prevent thermal deactivation of the catalyst, in case a process upset or burner fault incident occurs. In order to avoid a loss of performance, the catalyst shall be sampled by the facility or by the catalyst manufacturer and then tested by the catalyst manufacturer when a degradation in catalyst activity occurs, to check for poisoning, coating or for the need for replacement.

Regarding the catalyst performance, any possible degradation in catalyst activity can be seen through a temperature rise or a pressure drop. The user should track down these values and investigate any observed changes. The unit provides a recording of the temperature rise and provides a warning when the pressure drops across the metal monolith. The catalyst shall be sampled by the facility or by the catalyst manufacturer and then tested by the catalyst manufacturer only when a difference in operational performance is established. Once the cause of performance is known, the best method of regenerating the catalyst can be established. The proper cleaning procedure(s) can remove contaminants from the catalyst and usually restore the catalyst activity. These records of inspection, maintenance sampling (when necessary) and analysis shall be maintained on-site in an orderly manner for five years and shall be available for NYSDEC review upon request.

The facility shall comply with 6NYC 200.7 which requires the emission control device, the catalytic fume oxidizer, to be kept 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.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 550 degrees Fahrenheit



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Upper Permit Limit: 950 degrees Fahrenheit
Reference Test Method: Keep Records
Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2004.
Subsequent reports are due every 6 calendar month(s).

Condition 1-12: Compliance Certification

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 234.3(a)(3)(iii)

Item 1-12.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI
Process: P01

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

Item 1-12.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

According to 6 NYCRR 234.3(a)(3)(iii), the capture system and the air cleaning device used to control emissions for any flexographic printing process must provide for an overall reduction in VOC emissions of at least 60 percent.

Stack emissions testing used to verify compliance with this limit should be conducted at least once per permit term or more frequently upon request of the regulatory agency. Testing should be completed within 180 days after permit issuance. But, the catalytic oxidizer at NAP Industries, Inc. must provide for an overall reduction in VOC emissions of at least 90 percent. This is due to the issue that all the VOC calculations used for the Netting Analysis to verify the non-applicability of the New Source Review, Subpart 231-2 are based on 90% VOC reduction during the period that the catalytic oxidizer is operating (RACT seasonal variance).

The requirements of 6NYCRR234.3(a)(3)(iii) are as

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follows:

The owner or operator of a flexographic printing process subject to this Part, shall not operate, cause, allow or permit the operation of such processes unless the capture system and the air cleaning device provide for an overall reduction in volatile organic compound emissions of at least 60.0 percent (90 percent for NAP Industries, Inc.). To comply with 6NYCRR234.3(a)(iii), the facility has chosen to comply with the 100 % capture efficiency of the total room enclosure of the flexographic presses and 90 % destruction efficiency or the destruction efficiency determined from the stack testing results on the catalytic oxidizer.

The facility verified 100% capture efficiency of the PTE in accordance with 40CFR51, Appendix M, Method 204, "Criteria for the Verification of a Permanent or Temporary Total Enclosure" during the May 28, 1997 stack test for Emission Unit 0-00CFI. The May 28, 1997 stack test verified a 91.6% destruction efficiency of VOC emissions. Reasonable steps shall be taken to maximize the capture of VOC emissions from the VOC sources. Overall reduction shall be the combined efficiency of capture of VOC and destruction in the catalytic oxidizer. Therefore, the overall reduction in volatile organic compounds (VOC) emissions as a result of the catalytic oxidizer shall be no less than 90%. An overall catalytic oxidizer's destruction efficiency of 90% for this facility shall be used for purposes of calculating HAPs and VOC emissions reduction when the control system is operating.

Parameter Monitored: DESTRUCTION EFFICIENCY

Upper Permit Limit: 90 percent reduction by weight

Reference Test Method: Part 60, Method 25

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 1-13: Compliance Certification

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 234.4(c)(1)

Item 1-13.1:

The Compliance Certification activity will be performed for:



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Emission Unit: 0-00CFI

Process: P01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-13.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The inlet gas temperature to the bed of the catalytic oxidizer shall be monitored continuously in order to demonstrate compliance with Part 234. The pre-heat (inlet) temperature of the gas to the catalytic bed shall be maintained at no less than 550 degrees Fahrenheit and no more than 950 degrees Fahrenheit and the outlet gas temperature out of the bed of the catalytic oxidizer shall be maintained at no less than 550 degrees Fahrenheit at all times of operation at which compliance with Part 234 has been demonstrated by performance tests. The temperatures shall be measured and recorded by a sensing device and recorded respectively. Such records shall be maintained at the site and kept for a period of five years, and shall be presented upon request by Department representatives. The catalytic oxidizer must be operated from March 1 to October 31 as per Part 234.3(f)(3). When and if required, during off-season (November 1 to February 28), the catalytic oxidizer will be activated and operated upon notification by NYSDEC or USEPA.

The continuous monitor which measures the inlet, the exhaust and the catalytic bed temperatures, shall be installed and periodically calibrated according to the manufacturer's specifications, and shall be operated at all times that the catalytic oxidizer is operating (between March 1 and October 31).

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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The initial report is due 1/30/2004.

Subsequent reports are due every 6 calendar month(s).

Condition 1-14: Compliance Certification

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 234.4(c)(1)

Item 1-14.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-14.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The inlet gas temperature to the bed of the catalytic oxidizer shall be monitored continuously in order to demonstrate compliance with Part 234. The pre-heat (inlet) temperature of the gas to the catalytic bed shall be maintained at no less than 550 degrees Fahrenheit and no more than 950 degrees Fahrenheit and the outlet gas temperature out of the bed of the catalytic oxidizer shall be maintained at no less than 550 degrees Fahrenheit at all times of operation at which compliance with Part 234 has been demonstrated by performance tests. The temperatures shall be measured and recorded by a sensing device and recorded respectively. Such records shall be maintained at the site and kept for a period of five years, and shall be presented upon request by Department representatives. The catalytic oxidizer must be operated from March 1 to October 31 as per Part 234.3(f)(3). When and if required, during off-season (November 1 to February 28), the catalytic oxidizer will be activated and operated upon notification by NYSDEC or USEPA.

The continuous monitor which measures the inlet, the exhaust and the catalytic bed temperatures, shall be installed and periodically calibrated according to the manufacturer's specifications, and shall be operated at all times that the catalytic oxidizer is operating



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(between March 1 and October 31).

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 950 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2004.

Subsequent reports are due every 6 calendar month(s).

Condition 1-15: Compliance Certification

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 234.4(c)(1)

Item 1-15.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-15.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The exhaust gas temperature from all incinerators used to comply with 6NYCRR Part 234 shall be monitored continuously. The temperature of the exhaust gas shall not fall below the minimum temperature at which compliance with Part 234 has been demonstrated by performance test.

The continuous monitor shall be installed, periodically calibrated, and operated at all times that the incinerator is operating.

Manufacturer Name/Model Number: ANGUIL ENVIRONMENTAL SYSTEMS INC./100

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED

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VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2004.

Subsequent reports are due every 6 calendar month(s).

Condition 1-16: monitoring

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 234.4(c)(4)

Item 1-16.1:

This Condition applies to Emission Unit: 0-00CFI

Process: P01

Item 1-16.2:

shall be installed,

periodically calibrated and operated at all times the associated control equipment is operating.

Condition 1-17: Compliance Certification

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable Federal Requirement: 6NYCRR 234.3(f)(3)

Item 1-17.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P02

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The commissioner may allow sources which use natural gas fired afterburners as control devices for processes subject to Part 234, to shut down these natural gas fired afterburners from November 1st through March 31st for the purposes of natural gas conservation, provided that the commissioner has determined that this action will not jeopardize air quality. Such information shall be submitted with the application for a permit to construct, a certificate to operate, or renewal of a certificate to operate for an existing source under the provisions of

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Part 201.

NAP industries, Inc. was granted such permission for the shutdown of the catalytic oxidizer from November 1 to March 31, a permit to operate with a Seasonal Variance for Incineration/Catalytic Oxidation under stipulations of Part 234.3, for the shutdown of the catalytic oxidizer from November 1 to March 31. The facility has been operating under an approved seasonal variance from the use of the gas-fired catalytic oxidizer since 12/1 1995. The facility has performed a stack test on May 28, 1997 and submitted the results of the performance of the incineration/catalytic oxidation system of the volatile organic compounds from the flexographic printing operation, which showed a VOC destruction efficiency of 91%.

In order to stay beneath (remain below) the threshold of new emissions that would require the facility to be subject to the New Source Review, 6 NYCRR Part 231, NAP has removed printing press P1 (Kidder, 6-color, 36 inches & Emission Source 000P1), and is proposing to reinstall printing press P4 (original CMF Beta 808, 8-color, 50 inches & Emission Source 000P4) and increase the use of the facility's catalytic oxidizer under its RACT seasonal variance (from 7 months to 8 months) under 6 NYCRR 234.3(f)(3) and commit to a federally enforceable cap on operating hours (6916 hours/year as compared to 8760 hours/year). This permit modification does not add, remove or change in any way the applicable and pertinent regulations of the existing Title V permit, including record keeping and reporting requirements.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2004.

Subsequent reports are due every 6 calendar month(s).



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Permittees may also

have other obligations under regulations of general applicability

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable and are not subject to annual compliance certification requirements for Title V permits.

Condition 1-18: Contaminant List

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable State Requirement: ECL 19-0301

Item 1-18.1:

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



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CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY998-00-0

Name: VOC

Condition 1-19: Unavoidable noncompliance and violations

Effective between the dates of 12/11/2003 and 10/21/2006

Applicable State Requirement: 6NYCRR 201-1.4

Item 1-19.1:

Standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be during and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which ent, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such g normal working hours, but in any event not later than two working days after becoming aware that the malfunction representative, the facility owner and/or operator shall submit a written report to the commissioner's representative s, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this nts more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described h air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

in conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take icable ambient air

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issioner,. shall be

applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

nance standard or

national emissions standard for hazardous air pollutants) excused, the specific federal regulation must

unctions or upsets.

Condition 57: Air pollution prohibited

Effective between the dates of 10/22/2001 and 10/21/2006

Applicable State Requirement: 6NYCRR 211.2

Item 57.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, property, or which

unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence

not limited to, any

particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.