

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
Effective Date: 03/30/2007 Expiration Date: 03/29/2012

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 (Ren 1)

NAP Industries, located at 667 Kent Avenue in Brooklyn, New York is engaged in flexographic printing operations of mainly plastic substrates, operating under an approved seasonal variance from VOC incineration. The standard industrial classification codes are 3081- Unsupported Plastics Film and Sheet, 2673-Plastics, Foil, and Coated Paper Bags and 2759- Flexographic Printing.

This is a renewal of the Title V operating permit for NAP Industries. The facility operates five (5) flexographic printing presses, and one (1) natural gas fired catalytic oxidizer. Operations have remained essentially unchanged. In the original Title V permit for NAP Industries, Inc., that was issued on 10/22/2001, NAP Industries Inc, has replaced a flexographic printing press, P4 (CMF Beta 808 Press, 8-color, 50 inches with a two roller system that has an ink fountain - Emission Source: 000P4) with another newer model flexographic printing press, P4A (CMF Omat Press, 8-color, 50 inches & Emission Source: 00P4A) that is equipped with enclosed doctor inking system that helps to reduce emissions. The emissions from the new press will be equal to or less than the emissions from the old press. A USEPA



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research triangle project on doctor blade systems projected a reduction of fifty percent in solvent used compared to the two roll system. 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.

Then, there was a minor permit modification that was issued on 12/11/2003 to reinstate or to reactivate flexographic printing press P4 (original 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 began operating this CMF Beta 808 press on 12/11/2003.

NAP Industries consists of one emission unit, nine emission points, two processes, and five emission sources/control. The facility operates five (5) flexographic printing presses operating under an approved seasonal variance from VOC incineration. The five (5) flexographic printing presses apply solvent-based inks to polyethylene rolled sheeting producing material for a variety of commercial and industrial packaging applications. Emission Unit 0-00CFI consists of five (5) Central Impression Cylinder (CIC) flexographic printing presses that are used to print on polyethylene substrate. Emissions from each printing press (Emission Sources 000P2, 000P3, 000P4, 000P5 & 00P4A) are ducted/directed commonly to a gas-fired catalytic oxidizer (Emission Control 00001) 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 (0002A, 0002B, 0003A, 0003B, 00004, 00005, 00007 & 00008) directly to the atmosphere. Process P01 was modified on 12/11/2003 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 was modified on 12/11/2003 to be decreased from a 5-month period to a 4-month period between November 1 and February 28.

NAP Industries, Inc. is a flexographic printing facility using both aqueous-based and solvent-based inks applied to paper and film substrates. Normal operations include a 6-day work week during this period. 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. But, 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. increased the use of the facility's oxidizer from 7 months to 8 months (between March 1 and October 31) under its RACT seasonal variance and committed to a federally enforceable cap on operating hours (6916 hours/year instead of 8760 hours/year).

The facility operates five (5) flexographic printing presses, and one (1) natural gas fired catalytic



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oxidizer. Operations have remained essentially unchanged. NAP Industries , Inc. has five flexographic printing presses, they are as follows:

Printing Press	Printing Press ID	Emission Point	Emission Source/Control
Kidder (was removed on 3/25/2002)	P1	00001	000P1
Prestige 806	P2	0002A	000P2
Prestige 806	P2	0002B	000P2
Mirage 806	P3	0003A	000P3
Mirage 806	P3	0003B	000P3
CMF Beta 808 (original) (was reconnected on 12/11/2003)	P4	00004	000P4
CMF Omat 808 (first)	P5	00005	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 000P1), and installed the CMF Beta Press, P4 (Emission Source 000P4) and increased the use of the facility's oxidizer under its RACT seasonal variance (from March 1 thru October 31) and commit to a federally enforceable cap on operating hours.

The facility operates other sources which are considered exempt from permitting in accordance with 6 NYCRR 201-3.2(c), including fourteen (14) small boilers (under 10 MM BTU/hr each) and three (3) exhaust systems for solvent transfer, filling or sampling.

The Title V permit contains a complete listing of the applicable federal, state and compliance monitoring requirements for the facility, its emission units and emission points. This permit renewal 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.

The facility's potential emissions for volatile organic compounds exceed the major source threshold for Title V applicability. As such, the facility is subject to the permitting requirements stated in 6 NYCRR 201-6. The facility is subject to the provisions of 6 NYCRR 234. To comply with the requirements of 6 NYCRR 234-4(b)3 for its printing operations, the facility must follow record keeping/maintenance procedures of all the ink & solvent and HAP & VOC components of ink formulations purchased by the facility on a monthly basis. The facility is subject to 6 NYCRR 234-6, the proper handling, storage and disposal of VOC. Also, the facility is subject to 6 NYCRR 234-3(e), limiting the opacity from Emission

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Unit 0-00CFI to a maximum of 10%, but graphic arts processes that are subject to 6 NYCRR 234 are exempt from the provisions of 6 NYCRR 212-7(p). Emission Unit 0-00CFI is subject to 6 NYCRR 234-4(c)1, continuous monitors to measure the exhaust gas temperature of the incinerator and 6 NYCRR 234-4 (a), the VOC/solvent recovery and also 6 NYCRR 234-3(a)3(iii), the incinerator must destroy at least 60% of the VOC emitted. Finally, Emission Unit 0-00CFI is subject to 6 NYCRR 234-3(f)3, the RACT variance for VOC.

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

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Applications for Permit Renewals and Modifications
- Permit modifications, suspensions or 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
- Submission of application 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 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:



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

Condition 4: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 4.1:

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 4.2:

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 4.3:

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

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

Item 5.1:

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

Item 6.1:

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;

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

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

Condition 7: Submission of Applications for Permit Modification or Renewal-REGION 2 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 7.1:

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

Condition 8: Submission of application for permit modification or renewal-REGION 2 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)

Item 8.1:

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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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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

Facility: NAP - KENT AVENUE FACILITY
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

Permit Effective Date: 03/30/2007

Permit Expiration Date: 03/29/2012



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 201-6: Emission Unit Definition
- 24 6NYCRR 201-6.5(g): Non Applicable requirements
- 25 6NYCRR 234.4(b)(3): Compliance Certification
- 26 6NYCRR 234.4(b)(3): Compliance Certification
- 27 6NYCRR 234.6: Compliance Certification
- 28 40CFR 63.829(d), Subpart KK: Compliance Certification

Emission Unit Level

- 29 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 30 6NYCRR 201-6: Process Definition By Emission Unit

EU=0-00CFI

- 31 6NYCRR 212.7(p): Part 212 exemption for graphic arts processes subject to Part 234
- 32 6NYCRR 234.3(e): Compliance Certification
- 33 6NYCRR 234.4(a): control requirement
- 34 6NYCRR 234.4(a): Compliance Certification

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EU=0-00CFI,Proc=P01

- 35 6NYCRR 234.3(a): Compliance Certification
- 36 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 37 6NYCRR 234.4(c)(1): Compliance Certification
- 38 6NYCRR 234.4(c)(1): Compliance Certification
- 39 6NYCRR 234.4(c)(4): monitoring

EU=0-00CFI,Proc=P02

- 40 6NYCRR 234.3(f)(3): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 41 ECL 19-0301: Contaminant List
- 42 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 43 6NYCRR 211.2: Air pollution prohibited



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: Emergency Defense - 6NYCRR Part 201-1.5

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

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

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

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

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

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

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

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

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

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to



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Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

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

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

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

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

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

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

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

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in

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order to maintain compliance with the conditions of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

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

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

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit



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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.

Condition 2: Fees

Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring

Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 3.1:

The following information must be included in any required compliance monitoring 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;
- (iv) The analytical techniques or methods used including quality assurance and quality 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.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable



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regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

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.

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.

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(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 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.

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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 Quality Assurance (BQA) 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 4/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the

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following:

- i. Compliance certifications shall contain:
 - 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.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. 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.
- iv. 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 Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2



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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 BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 10/30/2007.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
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. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year



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Condition 8: Recordkeeping requirements
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:

(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.

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:

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

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT
TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:

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



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Condition 11: Recycling and Salvage
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:

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 the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 12.1:

No person shall 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.

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 201-3.2(a)

Item 13.1:

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 this Subpart. 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 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.

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 201-3.3(a)

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. 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 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.

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Condition 15: Standard Requirement - Provide Information
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 15.1:

The owner and/or operator 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. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart 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 emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:



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(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.

Condition 18: Off Permit Changes

Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such 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 provision 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 as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests

Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited

Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 211.3

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Item 20.1:

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

Condition 21: Accidental release provisions.

Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 40CFR 68

Item 21.1:

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 the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 22: Recycling and Emissions Reduction

Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 22.1:

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

The following conditions are subject to annual compliance certification requirements for Title V permits only.

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Condition 23: Emission Unit Definition
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1:

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

Emission Unit: 0-00CFI

Emission Unit Description:

Emission Unit 0-00CFI consists of five (5) Central Impression Cylinder (CIC) flexographic printing presses that are used to print on polyethylene substrate. Emissions from each printing press (Emission Sources (000P2, 000P3, 000P4, 000P5 & 00P4A) are ducted/directed commonly to a gas-fired catalytic oxidizer (Emission Control 00001) 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 four presses) are bypassing the catalytic oxidizer and are individually vented through individual emission points directly to the atmosphere. Process P01 was modified on 12/11/2003 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 was modified on 12/11/2003 to 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	Emission Press ID	Emission
Kidder 000P1		P1 00001	



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(removed 3/25/2002)				
Prestige 806	P2	0002A		
000P2				
Prestige 806	P2	0002B	000P2	
Mirage 806	P3	0003A		
000P3				
Mirage 806	P3	0003B		
000P3				
CMF Beta 808 (original)	P4	00004	000P4	
(to be reconnected)				
CMF Omat 808 (first)	P5	00005	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 000P1), and installed the CMF Beta Press, P4 (Emission Source 000P4) and increased the use of the facility's oxidizer under its RACT seasonal variance (from March 1 thru October 31) and commit to a federally enforceable cap on operating hours.

Building(s): MAIN/ROOF

Condition 24: Non Applicable requirements
Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 24.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

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."



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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 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 rated "A", since they contribute to ozone.

Condition 25: Compliance Certification
Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 25.2:

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:

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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 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.



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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.
The initial report is due 4/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 26: Compliance Certification
Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 26.2:

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

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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]

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



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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.

The initial report is due 4/30/2007.

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

Condition 27: Compliance Certification

Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 234.6

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 27.2:

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;

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(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:

- 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 4/30/2007.

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

Condition 28: Compliance Certification

Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 28.2:

Compliance Certification shall include the following monitoring:

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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.

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



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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 4/30/2007.
Subsequent reports are due every 6 calendar month(s).

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

**Condition 29: Emission Point Definition By Emission Unit
Effective between the dates of 03/30/2007 and 03/29/2012**

Applicable Federal Requirement: 6NYCRR 201-6

Item 29.1:

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

- Emission Unit: 0-00CFI
- Emission Point: 00001
 - Height (ft.): 25 Diameter (in.): 14
 - NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF
- Emission Point: 00004
 - Height (ft.): 33 Diameter (in.): 16
 - NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF
- Emission Point: 00005
 - Height (ft.): 31 Diameter (in.): 18
 - NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF
- Emission Point: 00007
 - Height (ft.): 33 Diameter (in.): 34
 - NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF
- Emission Point: 00008
 - Height (ft.): 32 Diameter (in.): 18
 - NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF



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Emission Point: 0002A
Height (ft.): 27 Diameter (in.): 10
NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF

Emission Point: 0002B
Height (ft.): 32 Diameter (in.): 10
NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF

Emission Point: 0003A
Height (ft.): 27 Diameter (in.): 14
NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF

Emission Point: 0003B
Height (ft.): 33 Diameter (in.): 14
NYTMN (km.): 4506.023 NYTME (km.): 587.633 Building: MAIN/ROOF

**Condition 30: Process Definition By Emission Unit
Effective between the dates of 03/30/2007 and 03/29/2012**

Applicable Federal Requirement: 6NYCRR 201-6

Item 30.1:

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:

Process P01 consists of five (5) flexographic printing presses Emission Unit 0-00CFI that 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: 000P5 - Process
Design Capacity: 50 inches

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

Item 30.2:

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:

Process P02 consists of the same five (5) flexographic printing presses used in Emission Unit 0-00CFI, are used between November 1 and March 31 yearly 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 Saturday. Total operating hours/week = 120 + 13 = 133 hours/week.



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

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

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

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

Condition 31: Part 212 exemption for graphic arts processes subject to Part 234
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 212.7(p)

Item 31.1:

This Condition applies to Emission Unit: 0-00CFI

Item 31.2:

Emissions of volatile organic compounds not given an "A" environmental rating that are released from graphic arts processes subject to 6NYCRR Part 234 or inks exempt from Part 234 (pursuant to section 234.1(h)) are exempt from the provisions of 6NYCRR Part 212.

Condition 32: Compliance Certification
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 32.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Item 32.2:

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.



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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 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



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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 33: control requirement
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 234.4(a)

Item 33.1:

This Condition applies to Emission Unit: 0-00CFI

Item 33.2:

When a printing process utilizes control equipment to comply with the provisions 6NYCRR Part 234, test methods acceptable to the Department must be used when demonstrating the overall removal efficiency.

(a) This demonstration may be performed by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control technique.

(b) For control equipment other than VOC/solvent recovery, this demonstration must include provisions to determine both the efficiency of the capture system and of the subsequent destruction and/or removal of these air contaminants by control equipment prior to their release to the atmosphere.

Condition 34: Compliance Certification
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 234.4(a)

Item 34.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

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

Item 34.2:

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

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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 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

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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 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



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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 PERMIT 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 4/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 35: Compliance Certification
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable Federal Requirement: 6NYCRR 234.3(a)

Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI
Process: P01

Regulated Contaminant(s):



CAS No: 0NY998-00-0 VOC

Item 35.2:

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 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

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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

Upper Permit Limit: 950 degrees Fahrenheit

Reference Test Method: Keep Records

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED



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RANGE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

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

Condition 36: Compliance Certification

Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 36.2:

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 follows:

The owner or operator of a flexographic printing process subject to this Part, shall not operate, cause, allow or



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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 of 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 37: Compliance Certification

Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 37.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P01



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Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 37.2:

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).

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
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

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



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Condition 38: Compliance Certification

Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 38.2:

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).



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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 to measure the exhaust gas temperature of the incinerator shall be installed, periodically calibrated, operated, and continuously monitored and recorder at all times that the incinerator is operating (between March 1 and October 31).

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

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 4/30/2007.

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

Condition 39: monitoring

Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 39.1:

This Condition applies to Emission Unit: 0-00CFI

Process: P01

Item 39.2:

Any continuous monitoring or recording device required by the commissioner shall be installed, periodically calibrated and operated at all times the associated control equipment is operating.

Condition 40: Compliance Certification

Effective between the dates of 03/30/2007 and 03/29/2012

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

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P02

New York State Department of Environmental Conservation

Permit ID: 2-6101-00016/00004

Facility DEC ID: 2610100016



Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 40.2:

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 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



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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 PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

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



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: 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 applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 41: Contaminant List
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable State Requirement: ECL 19-0301

Item 41.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this



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permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY998-00-0

Name: VOC

Condition 42: Unavoidable noncompliance and violations
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable State Requirement: 6NYCRR 201-1.4

Item 42.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping 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 maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superseded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.



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(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) 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.

Condition 43: Air pollution prohibited
Effective between the dates of 03/30/2007 and 03/29/2012

Applicable State Requirement: 6NYCRR 211.2

Item 43.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.