

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6101-00016/00004 Modification Number: 1



12/12/2003

Facility Identification Data

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

Owner/Firm

Name: N A P INDUSTRIES INC
Address: 667 KENT AVENUE
BROOKLYN, NY 11211-7530, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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Air Permitting Contact:
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667 KENT AVENUE
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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

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

This is a minor permit modification to reinstate or to reactivate flexographic printing press P4 (original CMF Beta 808 8-color, 50 inches, Emission Source: 000P4) that was initially constructed on 1/1/1996, permitted and began operating on 1/1/1996, but was disconnected on 3/30/2001 and was removed from the permit and used as an offset for a new printing press installation (newer model), Press P4A (CMF Omat Press, 8-color, 50 inches & Emission Source: 00P4A). In order to compensate/offset the VOC emissions for the reactivation of P4, NAP Industries has sold and permanently removed from the facility on 3/25/2002, flexographic printing press P1 (Kidder, 6-color, 36 inches & Emission Source: 000P1) that began operating on 2/01/1975. The facility is planning to begin operating this Beta 808 press upon the issuance of this Title V modification, which is expected around 11/31/2002.

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

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

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

Attainment Status

NAP - KENT AVENUE FACILITY is located in the town of BROOKLYN in the county of KINGS. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT

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Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

NAP Industries, Inc. is a flexographic printing facility using both aqueous-based and solvent-based inks applied to paper and film substrates.

NAP Industries, Inc. has five flexographic printing presses, they are as follows:

Printing Press	Printing Press ID	Emission Point	Emission Source/Control
Kidder (removed 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) (to be reconnected)	P4	000P4	000P4
CMF Omat 808 (first)	P5	000P5	000P5
Omat 808 (second)	P4A	00008	00P4A
Oxidizer	(Emission Control)	00007	00001



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Permit Structure and Description of Operations

The Title V permit for NAP - KENT AVENUE FACILITY is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

NAP - KENT AVENUE FACILITY is defined by the following emission unit(s):

Emission unit 000CFI - Five (5) Central Impression Cylinder (CIC) flexographic printing presses comprising Emission Unit 0-00CFI are used to print on polyethylene substrate. Emissions from each printing press are ducted/directed commonly to a gas-fired catalytic oxidizer to destroy the VOC during the period from April 1 to October 31 (summer months - Process P01), yearly 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 (winter months - Process P02), the emissions from each press (the same five presses) are bypassing the catalytic oxidizer and are individually vented through individual emission points directly to the atmosphere. Process P01 is now being modified to be increased from a 7-month period to an 8-month period between March 1 and October 31 in order to remain below the threshold of new emissions that would require the facility to be subject to the New Source Review, 6 NYCRR 231-2. Subsequently, Process P02 is now being modified 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	Printing	Emission	Emission	Press ID	Point
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Source

Kidder (removed 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) (to be reconnected)	P4	000P4	000P4
CMF Omat 808 (first)	P5	000P5	000P5
Omat 808 (second)	P4A	00008	00P4A
Oxidizer (Emission Control)		00007	00001

Emission unit 000CFI is associated with the following emission points (EP):
00004, 00005, 00007, 00008, 0002A, 0002B, 0003A, 0003B

It is further defined by the following process(es):

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

Normal operations include a 6-day work week during this period. The operating schedule calls for operation of 24 hours/day for Sunday through Thursday (120 hours), Fridays only until 1:00 pm (13- hour day), and closed all day Saturday. Total operating hours/week = 120 + 13 = 133 hours/week.

Process: P02 is located at 1ST, Building MAIN/ROOF - The same five flexographic printing presses used in Emission Unit 0-00CFI, in Process P01, are used between November 1 and March 31 yearly (Process P02) under a RACT seasonal variance without the use of the catalytic oxidizer. The printing presses are used to print on packaging materials by applying solvent based inks to polyethylene sheeting. Each press has its own individual emission point, and the presses commonly duct/vent to the individual emission point between November 1 and March 31. The five-month use of bypassing the catalytic oxidizer and venting directly to the atmosphere is being reduced to a four-month period between November 1 and February 28 in order to remain below the threshold of new emissions that would require the facility to be subject to the New Source Review, 6 NYCRR 231-2

Normal operations include a 6-day work week during this period. The operating schedule calls for operation of 24 hours/day for Sunday through Thursday (120 hours), Fridays only until 1:00 pm (13- hour day), and closed all day Saturday. Total operating hours/week = 120 + 13 = 133 hours/week.

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Title V/Major Source Status

NAP - KENT AVENUE FACILITY is subject to Title V requirements. This determination is based on the following information:

NAP Industries Inc. is a major facility subject to the Title V requirements because the potential emissions of volatile organic compounds (VOC) is greater than the major source thresholds, which is 25 tons per year for volatile organic compounds for major facilities located in the severe ozone nonattainment area.

Program Applicability

The following chart summarizes the applicability of NAP - KENT AVENUE FACILITY with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

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NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

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SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2673	BAGS: PLASTICS, LAMINATED AND COATED
2759	COMMERCIAL PRINTING, NEC
3081	UNSUPPORTED PLASTICS FILM AND SHEET

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
4-05-003-11	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL PRINTING - FLOXOGRAPHIC

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

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Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
0NY100-00-0	HAP		> 0 but < 2.5 tpy
0NY998-00-0	VOC		>= 100 tpy but < 250 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Sealing - 6NYCRR Part 200.5

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

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

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

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

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

Any person who owns or operates an air contamination 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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Item D: Unpermitted Emission Sources - 6NYCRR Part 201-1.2

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
 - (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
 - (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the 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.

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

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

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

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

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

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

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

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

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

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

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compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

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

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

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

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

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

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

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

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

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

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confidentiality.

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

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

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

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

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

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

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

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

- i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

- i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

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

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

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permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements

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(including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

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

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

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item AA: Open Fires - 6 NYCRR Part 215

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

Item BB: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action

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authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item CC: Federally Enforceable Requirements - 40 CFR 70.6(b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

Regulatory Analysis

Location	Regulation	Short Description	Condition
Facility/EU/EP/Process/ES			

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Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports

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required by the permit.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

Facility Specific Requirements

In addition to Title V, NAP - KENT AVENUE FACILITY has been determined to be subject to the following regulations:

40CFR 63-KK.829 (d)

This rule requires that owners or operators of each facility seeking designation as an area source must maintain records of all required measurements and calculations needed to demonstrate compliance with the criteria specified in § 63.820(a)(2). These criteria specify that to be designated an area source under this subpart the facility must use less than 9.1 Mg (10 tons) of each individual HAP and 22.7 Mg (25 tons) of total HAP compounds per rolling 12-month period. Records to be maintained include the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

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6NYCRR 201-6.5 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 212 .7 (p)

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

6NYCRR 229 .1 (b) (2) (iv)

This rule requires VOL storage tanks that are less than 10,000 gallons to be equipped with a conservation vent.

6NYCRR 234 .3 (a)

The control strategies which can be used for packaging rotogravure, publication rotogravure or flexographic printing are outlined in section 234.3(a).

6NYCRR 234 .3 (a) (3) (iii)

The capture system and air cleaning device must be designed and operated such that the following minimum overall removal efficiencies of volatile organic compounds is achieved:

- flexographic printing processes - 60%

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

6NYCRR 234 .3 (e)

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

6NYCRR 234 .3 (f) (3)

The permitted facility has been granted a variance to shut down the natural gas fired afterburner(s) used as a control device for processes subject to Part 234 during the period of November 1st through March 31st. This variance was granted in order to conserve natural gas supplies. The DEC has determined that air quality will not be jeopardized due to the seasonal shutdown of the afterburner.

6NYCRR 234 .4 (a)

This requirement applies to printing operations which utilize control equipment to control emissions. It requires that test methods acceptable to the Department must be used when demonstrating the overall



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removal efficiency. This demonstration may be done in the following manner:

(1) By directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control technique. Methods described in Section 234.5(b)(1) and (b)(2) of this Part must be used.

(2) 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.

6NYCRR 234.4 (b) (3)

The facility is required to maintain records of purchases and usage of inks, volatile organic compounds, and solvents. The facility maintains these records in a log book for a minimum of five years.

6NYCRR 234.4 (c) (1)

This regulation requires any affected printing operation which uses an incinerator as an air cleaning device to control VOC emissions to install, operate and periodically calibrate instrumentation to monitor the exhaust gas temperature.

6NYCRR 234.4 (c) (4)

The facility is required to continuously monitor the following parameters:

1. The pre-heat (inlet) temperature of the gas to the catalytic bed and
2. The outlet gas temperature out of the bed of the catalytic oxidizer.

6NYCRR 234.6

This requirement pertains to general provisions for the handling, storage and disposal of volatile organic compounds and applies to open containers except where production, sampling, maintenance or inspection procedures require operation access; and to actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location	Short Description	Regulation
Facility/EU/EP/Process/ES		
0-00CFI/-/P01	Exemptions	6NYCRR 212.7 (p)
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.		
0-00CFI/-/P02	Exemptions	6NYCRR 212.7 (p)



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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.

0-00CFI/00007/P01/00001 Exemptions 6NYCRR 212.7(p) 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.

FACILITY New Source Review in 6NYCRR 231-2 Nonattainment Areas and Ozone Transport Region

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

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

0-00CFI New Source Review in 6NYCRR 231-2 Nonattainment Areas and Ozone Transport Region

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

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

Table with 5 columns: Printing Press ID, Point, Source, Printing Emission, Emission. Rows include Kidder (removed 3/25/2002) and Prestige 806.



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

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

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

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

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

DETERMINATION OF CONTEMPORANEOUS PERIOD:

The contemporaneous period for VOC in the severe ozone non-attainment area is five (5) calendar years ending in the calendar year that the new project commences operation. In this case, the reactivation of the CMF Beta 808 printing press will commence operating upon the issuance of this modified permit (about the end of December, 2003). Hence, the contemporaneous period is January 1, 1999 to December 31, 2003.

NETTING ANALYSIS:

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

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

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

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

Future Actual minus past Actual with operating hours cap (based on 6916 hours) = Actual Post-Control -



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4-month w/o oxidizer = (118.98 - 83.5) = 35.48 TPY

Future Potential minus Past Actual (based on 8760 hours) = Potential

Post-Control - 4 month w/o oxidizer =

(126.93 - 83.5) = 43.43 TPY

Future Actual minus past Actual (based on 6916 hours) = Actual Post-Control - 4

month w/o oxidizer =

(100.18 - 83.5) = 16.68 TPY

SUBPART 231-2 APPLICABILITY ANALYSIS:

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

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

The Significant Source Project Threshold (SSPT) = 2.5 TPY

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

= (100.18 TPY - 83.5 TPY) = 16.68 TPY

The PEP is > SSPT of 2.5 TPY

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

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

NEI = 16.68 TPY

0 - 0 = 16.68 TP

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

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

CONCLUSION:

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

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at NAP - KENT AVENUE FACILITY:

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Location	Type of Monitoring	Cond No.
Facility/EU/EP/Process/ES		

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

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

FACILITY	Applicability	6NYCRR 231-2.2
FACILITY	record keeping/maintenance procedures	1-7
FACILITY	record keeping/maintenance procedures	1-3
FACILITY	record keeping/maintenance procedures	29
FACILITY	record keeping/maintenance procedures	33
0-00CFI/-/P01	monitoring of process or control device parameters as surrogate	1-11
0-00CFI/-/P01	intermittent emission testing	1-12
0-00CFI	monitoring of process or control device parameters as surrogate	1-9
0-00CFI/-/P02	record keeping/maintenance procedures	1-17
0-00CFI	work practice involving specific operations	1-10
FACILITY	record keeping/maintenance procedures	1-5
FACILITY	record keeping/maintenance procedures	1-6
0-00CFI/-/P01	monitoring of process or control device parameters as surrogate	1-13
0-00CFI/-/P01	monitoring of process or control device parameters as surrogate	1-14
0-00CFI/-/P01	monitoring of process or control device parameters as surrogate	1-15
FACILITY	record keeping/maintenance procedures	41

Basis for Monitoring

This facility is subject to the requirements of Title V. The facility is required, under the provisions of 6 NYCRR Subpart 201-6, to submit semiannual compliance reports and an annual Compliance Certification. This facility has to comply with the following monitoring conditions:

Condition 1-3 for 6 NYCRR 201-6.5(c)(3)(ii): This is a facility-wide condition. This condition specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

Condition 29 for 6 NYCRR 201-6.5(e): This is a facility-wide condition. This condition is for Recordkeeping/Maintenance Procedures and specifies the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office addresses where the reports are to be sent.

Condition 33 for 6 NYCRR 202-2.1: This is a facility-wide condition. This condition is for

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Recordkeeping/Maintenance Procedures and sets forth the applicability criteria for submitting an annual statement of emissions. The criteria is based on annual emission threshold quantities and ozone attainment designation. This condition is a requirement for all Title V facilities. These facilities must submit an annual emission statement by April 15th of each year for emissions of the previous calendar year.

Condition 1-5 for 6 NYCRR 234.4(b)(3): This is a facility-wide condition. This condition is for Recordkeeping/Maintenance Procedures for VOC. The facility is required to maintain records of purchases and usage of inks, volatile organic compounds, and solvents. The facility maintains these records in a log book for a minimum of five years.

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

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

In addition, copies of all purchase orders, invoices, and other documents for supplies and equipment that are used to support the monthly and the yearly log are to be kept on site.

Condition 1-6 for 6 NYCRR 234.4(b)(3): This is a facility-wide condition. This condition is for Recordkeeping/Maintenance Procedures for HAPs. The facility is required to maintain records of purchases and usage of inks, volatile organic compounds, and solvents. The facility maintains these records in a log book for a minimum of five years.

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

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

In addition, copies of all purchase orders, invoices, and other documents for supplies and equipment that are used to support the monthly and the yearly log are to be kept on site.

Condition 41 for 6 NYCRR 234.6: This is a facility-wide condition. This condition is for Recordkeeping/Maintenance Procedures for VOC. This condition requires the facility to conduct daily inspections to ensure that all containers (etc.) used to store volatile organic compounds are properly closed in order to minimize emissions of these compounds.

Condition 1-7 for 40 CFR 63.829(d), subpart KK: This is a facility-wide condition. This condition



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is for Recordkeeping/Maintenance Procedures for HAPs. This condition requires that owners or operators of each facility seeking designation as an area source must maintain records of all required measurements and calculations needed to demonstrate compliance with the criteria specified in § 63.820(a)(2). These criteria specify that to be designated an area source under this subpart the facility must use less than 9.1 Mg (10 tons) of each individual HAP and 22.7 Mg (25 tons) of total HAP compounds per rolling 12-month period. Records to be maintained include the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

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. These records shall be kept on a monthly basis, and shall include mass of all HAP-containing materials used during the month, and the mass fraction of HAP present in each HAP-containing material used. 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.

Condition 1-9 for 6 NYCRR 234.3(e): This condition is an emission unit level for Monitoring of Process or Control Device Parameters as Surrogate for opacity that applies to Emission Unit 0-00CFI. The emissions to the outdoor atmosphere may not exceed an average opacity greater than 10% for any consecutive six-minute period from any emission source subject to Part 234.

The opacity limit for facilities subject to Part 234 is 10%. The facility must observe each stack which is being used to vent emissions into the atmosphere on a daily basis. If a visible plume is observed on two consecutive days, then a Method 9 analysis would be required to measure the opacity. If no visible plume is observed, it can be assumed that the opacity limit is not being exceeded.

Condition 1-10 for 6 NYCRR 234.4(a): This condition is an emission unit level for Work Practice Involving Specific Operations for VOC that applies to Emission Unit 0-00CFI. 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. This requirement applies to printing operations which utilize control equipment to control emissions. It requires that test methods acceptable to the Department must be used when demonstrating the overall removal efficiency. This demonstration may be done in the following manner:

(1) By directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control technique. Methods described in Section 234.5(b)(1) and (b)(2) of this Part must be used.

(2) 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.

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At all times that any of the printing presses are in operation between March 1 and October 31, NAP Industries, Inc. shall satisfy the Permanent Total Enclosure requirement for the capture efficiency as specified in USEPA Method 204. The capture efficiency for VOC emissions from the printing operations is assumed to be 100% based on the results of the criteria test specified in Method 204 for Permanent Total Enclosures (PTE). A PTE is an enclosure that completely surrounds a source such that all volatile organic compound emissions are contained and directed to a control device. The Permanent Total Enclosures at the facility is the room containing the presses. The control device is a natural gas fired catalytic oxidizer which handles the emissions from all the printing presses from March 1 through October 31. The permit provide that all the presses in the press room are to be contained in a "total enclosure" as defined by USEPA guidelines and satisfies EPA Method 204 and the emissions would be controlled by the catalytic oxidizer.

Condition 1-11 for 6 NYCRR 234.4(c)(1): This condition is an emission unit level and process level for Monitoring of Process or Control Device Parameters as Surrogate for opacity that applies to Emission Unit 0-00CFI and Process P01. This regulation requires any affected printing operation which uses an incinerator as an air cleaning device to control VOC emissions to install, operate and periodically calibrate instrumentation to monitor the exhaust gas temperature.

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 and at no more than 950 degrees Fahrenheit at all times of operation at which compliance with Part 234 has been demonstrated by performance tests. Maximum catalyst bed temperature should not exceed 950 degrees Fahrenheit. 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).

Condition 1-12 for 6 NYCRR 234.4(c)(1): This condition is an emission unit level and process level for Monitoring of Process or Control Device Parameters as Surrogate for opacity that applies to Emission Unit 0-00CFI and Process P01. This regulation requires any affected printing operation which uses an incinerator as an air cleaning device to control VOC emissions to install, operate and periodically calibrate instrumentation to monitor the exhaust gas temperature.

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 and at no more than 950 degrees Fahrenheit at all times of operation at which

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compliance with Part 234 has been demonstrated by performance tests. Maximum catalyst bed temperature should not exceed 950 degrees Fahrenheit. 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).

Condition 1-13 for 6 NYCRR 234.3(a): This condition is an emission unit level and process level for Monitoring of Process or Control Device Parameters as Surrogate for opacity that applies to Emission Unit 0-00CFI and Process P01. This condition outlines the control strategies which can be used for packaging rotogravure, publication rotogravure or flexographic printing.

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-annual 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 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. 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

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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.

Condition 1-14 for 6 NYCRR 234.3(a)(3)(iii): This condition is an emission unit level for Intermittent Emission Testing for VOC that applies to Emission Unit 0-00CFI. The air pollution control equipment (catalytic oxidizer) must be operated such that a minimum of 90 % by weight of the volatile organic compounds are captured and destroyed before the exhaust gas is vented into the atmosphere. 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 between April 1 and October 30). The facility must demonstrate that this requirement is being met via tests acceptable to the NYSDEC. This facility has demonstrated compliance with this requirement by conducting a stack test in May 28, 1997. The facility verified the 100% capture efficiency of the PTE (Permanent Total Enclosure) in accordance with 40 CFR 51, 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. This stack test has also verified 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 %.

Condition 1-15 for 6 NYCRR 234.4(c)(1): This condition is an emission unit level and process level for Monitoring of Process or Control Device Parameters as Surrogate for opacity that applies to Emission Unit 0-00CFI and Process P01. The exhaust temperature from all incinerators used to comply with 6 NYCRR Part 234 shall be monitored continuously. The temperature of the exhaust gas shall not fall below the minimum temperature of 550 degrees Fahrenheit at which compliance with Part 234 has been demonstrated by performance test.

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

Condition 1-17 for 6 NYCRR 234.3(f)(3): This condition is an emission unit level for Recordkeeping/Maintenance Procedures for VOC that applies to Emission Unit 0-00CFI. NAP industries, Inc. was granted 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 and is not required to operate the air pollution control equipment (catalytic oxidizer) during the period of November 1 through 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%.