



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 2-6101-00016/00004
Effective Date: 05/10/2017 Expiration Date: 05/09/2022

Permit Issued To: N A P INDUSTRIES INC
667 KENT AVE
BROOKLYN, NY 11249

Contact: MORRIS LOWY
NAP INDUSTRIES INC
667 KENT AVE
BROOKLYN, NY 11249
(718) 625-4948

Facility: NAP - KENT AVENUE FACILITY
667 KENT AVE
BROOKLYN, NY 11249

Contact: MORRIS LOWY
NAP INDUSTRIES INC
667 KENT AVE
BROOKLYN, NY 11249
(718) 625-4948

Description:

PERMIT DESCRIPTION
NAP Industries, Inc.
DEC ID # 2-6101-00016/00004 (Ren 3)

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.

The Title V Permit Renewal #3 involves the replacement of two (2) "like" or "in kind" printing presses (Emission Sources 000P4 & 00P4A with Emission Sources 000P6 & 000P7) and the removal of one (1) more printing press without replacement (Emission Source 000P3). All four printing presses are 50 inches each and to be ducted to a new 25,000 CFM ANGUIL ENV. SYSTEMS Model 250 Regenerative Thermal Oxidizer - RTO (Emission Control 00008) which is replacing the 10,000 CFM ANGUIL ENV. SYSTEMS Model 100 Regenerative Thermal Oxidizer - RTO (Emission Control 00001), all under Emission Unit 0-00CFI. The removal of three (3) printing presses and the "in kind" replacement of two (2) printing presses will not result

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Facility DEC ID: 2610100016



in an increase in the facility's PTE; therefore, the facility is not subject to New Source Review or Part 231-2.2.

The following three (3) presses and RTO have been removed:

P3 - Mirage 806 Press, 6-color (Emission Source 000P3) - removed,

P4 - CMF Beta 808 Press, 8-color (Emission Source 000P4) - removed,

P4A - CMF Omat 808 Press (second), 8-color (Emission Source 00P4A) - removed, and

RTO - 10,000 CFM ANGUIL ENV. SYSTEMS/100 Regenerative Thermal Oxidizer (Emission Control 00001) - will be removed on 1/10/2017.

The following two (2) presses and RTO have been added:

P6 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P6) - new

P7 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P7) - new, and

RTO - 25,000 CFM ANGUIL ENV. SYSTEMS Model 250 RTO Regenerative Thermal Oxidizer (Emission Control 00008) - new

The four (4) flexographic printing presses and RTO in Emission Unit 0-00CFI at this facility are:

P2 - Prestige 806 Press, 6-color (Emission Source 000P2),

P5 - CMF Omat 808 Press (first), 8-color (Emission Source 000P5),

P6 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P6) - new,

P7 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P7) - new, and

RTO - 25,000 CFM ANGUIL ENV. SYSTEMS Model 250 RTO Regenerative Thermal Oxidizer (Emission Control 00008) - new.

This is a renewal of the Title V operating permit for NAP Industries, Inc., DEC ID #2-6101-00016/00004 that was issued on 3/20/2012. The facility operates four (4) flexographic printing presses (Emission Sources 000P2, 000P5, 000P6 & 000P7), and one (1) natural gas fired catalytic oxidizer (Emission Control 00008) in Emission Unit 0-00CFI to produce flexible packaging materials. Operations and processes at this facility have remained essentially unchanged since Ren #2 was issued on 3/20/2012, however; few equipment changes will occur under this permit renewal #3 and have been detailed in this permit. The facility is a major source of VOC, but a minor source of Hazardous Air Pollutants (HAPs).

The facility operates four (4) flexographic printing presses, and one (1) natural gas fired catalytic oxidizer to produce flexible packaging materials. Operations have remained essentially unchanged. NAP Industries, Inc. has four (4) flexographic printing presses in Emission Unit 0-00CFI, they are as follows:

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Printing Press	Printing Press ID	Emission Point	Emission Source/Control
Prestige 806	P2	00002	000P2
CMF Omat 808 (first)	P5	00005	000P5
Uteco Onyx 2295	P6	00006	000P6
Uteco Onyx 2295	P7	00007	000P7
RTO (Oxidizer)	(Emission Control)	00008	00008

All four flexographic printing presses are 50 inches each and are with gas-fired dryers. Printing press P2 is a 6-color press, and printing presses P5, P6 and P7 are 8-color each. The facility's regenerative thermal oxidizer (RTO) operates under its seasonal variance (from March 1 thru October 31).

NAP Industries consists of one emission unit, nine emission points, two processes, and four emission sources/control. The facility operates four (4) flexographic printing presses operating under an approved seasonal variance from VOC incineration. The four (4) 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 four (4) Central Impression Cylinder (CIC) flexographic printing presses that are used to print on polyethylene substrate. Emissions from each printing press (Emission Sources 000P2, 000P5, 000P6 & 000P7) are ducted/directed commonly to a gas-fired catalytic oxidizer (Emission Control 00001) to destroy the VOC during the period from March 1 to October 31 yearly (ozone season - Process P01), operating under a seasonal variance from using the catalytic oxidizer between November 1 and February 28. The catalytic oxidizer is not operated during the remaining part of the year (November 1 to February 28) as per a variance under 6 NYCRR Part 234.3(h). When the catalytic oxidizer is not being used between November 1 and February 28 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 (00002, 00005, 00006 & 00007) 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. 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 seasonal variance operating between March 1 and October 31, with a destruction efficiency of 90% before emitting to the environment. Since 12/11/2003, 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, NAP Industries, Inc. has increased the use of the facility's oxidizer from 7 months to 8 months (between March 1 and October 31) under its seasonal variance.



The facility is a major source of VOC, but a minor source of Hazardous Air pollutants (HAPs). HAPs emissions since Ren #1 was issued on 3/30/2007, on average amount to less than 3,000 pounds annually. Speciated HAPs and VOC emissions from combustion sources are minimal. The facility's NESHAP compliance is met by exemption as no individual HAP exceeds 10 TPY emissions and combined HAP emissions are less than 25 TPY. The VOC emissions are driven by the production-related printing operations and their subsequent emissions from the solvent-based printing inks and press cleaning materials that contain volatile organic compounds (VOC). Since Ren #2 was issued on 3/20/2012, the annual facility VOC emissions have steadily decreased from a peak of 96 tons in 2013 to a low of 74 tons in 2011.

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. 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) 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, and 6 NYCRR 234.7 for recordkeeping requirements. Also, the facility is subject to 6 NYCRR 234-8, limiting the opacity from Emission 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 212-1.4 (p). Emission Unit 0-00CFI is subject to 6 NYCRR 234-4(c), 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(b)(1)(i), the incinerator must destroy at least 90% of the VOC emitted, and 6 NYCRR 234.3(e)(1)(ii), the control requirements for removal efficiency. Finally, Emission Unit 0-00CFI is subject to variance for VOC under 6 NYCRR 234.3(h), the afterburner shutdown between November 1 and February 28. The facility will demonstrate that it is not subject to 40 CFR 63.829(d), printing and publishing NESHAP- recordkeeping by maintaining 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.

The facility operates other sources which are considered exempt from permitting in accordance with 6 NYCRR 201-3.2(c), including twelve (12) small boilers (under 10 MM BTU/hr each) and one (1) exhaust system for solvent transfer, filling or sampling.

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.

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



Permit Administrator: STEPHEN A WATTS
 47-40 21ST ST
 LONG ISLAND CITY, NY 11101-5401

Authorized Signature: _____ Date: ____ / ____ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal -
REGION 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: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3

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



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

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

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal - REGION 2 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

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

New York State Department of Environmental Conservation

Permit ID: 2-6101-00016/00004

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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 AVE
BROOKLYN, NY 11249

Facility: NAP - KENT AVENUE FACILITY
667 KENT AVE
BROOKLYN, NY 11249

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: 05/10/2017

Permit Expiration Date: 05/09/2022



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.4 (a) (7): Fees
- 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 23 6 NYCRR 201-6.4 (g): Non Applicable requirements
- 24 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *25 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 26 6 NYCRR 211.1: Air pollution prohibited
- 27 6 NYCRR 234.1 (c): Once in, always in
- 28 6 NYCRR 234.3 (b) (1) (i): Compliance Certification
- 29 6 NYCRR 234.3 (e) (1) (ii): Compliance Certification
- 30 6 NYCRR 234.3 (h): Compliance Certification
- 31 6 NYCRR 234.4 (a): Compliance Certification
- 32 6 NYCRR 234.4 (a): Compliance Certification
- 33 6 NYCRR 234.4 (c): Compliance Certification
- 34 6 NYCRR 234.4 (c): Compliance Certification
- 35 6 NYCRR 234.4 (c): Compliance Certification
- 36 6 NYCRR 234.6: Compliance Certification
- 37 6 NYCRR 234.7: Compliance Certification
- 38 6 NYCRR 234.7: Compliance Certification
- 39 6 NYCRR 234.7: Compliance Certification
- 40 40CFR 63.829(d), Subpart KK: Compliance Certification

Emission Unit Level

- 41 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 42 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

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EU=0-00CFI

- 43 6 NYCRR 234.4 (b): Compliance Certification
- 44 6 NYCRR 234.8: Compliance Certification
- 45 6 NYCRR 234.8: Compliance Certification

EU=0-00CFI,Proc=P01

- 46 6 NYCRR 234.3 (b) (1) (i): Compliance Certification
- 47 6 NYCRR 234.4 (a): Compliance Certification
- 48 6 NYCRR 234.4 (c): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 49 ECL 19-0301: Contaminant List
- 50 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

NOTE: * preceding the condition number indicates capping.



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: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 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 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.
- Item B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (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 C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (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 D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (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 E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (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 F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (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 G: Property Rights - 6 NYCRR 201-6.4 (a) (6)

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

Item H: Severability - 6 NYCRR 201-6.4 (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 I: Permit Shield - 6 NYCRR 201-6.4 (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 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 J: Reopening for Cause - 6 NYCRR 201-6.4 (i)

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

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of 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 therequirement is later than the date on which the 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 section 201- 6.6 of this Subpart.

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

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

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

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

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



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

Item K: 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 L: 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 05/10/2017 and 05/09/2022**

Applicable Federal Requirement: 6 NYCRR 200.6

Item 1.1:

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



reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement: 6 NYCRR 201-6.4 (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.
- (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 201-6.2(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.

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 may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2017.

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

Condition 6: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (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 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 record keeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as

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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 annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section
USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
Hunters Point Plaza
47-40 21st Street
Long Island City, NY 11101-5407

The address for the BQA is as follows:

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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 4/30/2018.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 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

Condition 8: Recordkeeping requirements
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 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 - Prohibitions
Effective between the dates of 05/10/2017 and 05/09/2022



Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS



Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 05/10/2017 and 05/09/2022

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

Item 14.1:

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 15: Requirement to Provide Information
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (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: Right to Inspect
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (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: Off Permit Changes
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)

Item 17.1:

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 201-6.4 shall not apply to any change made pursuant to this paragraph.

Condition 18: Required Emissions Tests
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 18.1:

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.

Condition 19: Accidental release provisions.
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:40 CFR Part 68

Item 19.1:

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;



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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 20: Recycling and Emissions Reduction
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:40CFR 82, Subpart F

Item 20.1:

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.

Condition 21: Emission Unit Definition
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 21.1:

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 four (4) Central Impression Cylinder (CIC) flexographic printing presses that are used to print on polyethylene substrate. Each printing press is 50 inches and the emissions from each printing press (Emission Sources (000P2, 000P5, 0000P6 & 000P7) are ducted/directed commonly to a gas-fired catalytic oxidizer(Emission Control 00008) to destroy the VOC during the period from March 1 to October 31 yearly (ozone season - Process P01), operating under a seasonal variance from using the catalytic oxidizer between November 1 and February 28. The catalytic oxidizer is not operated during the remaining part of the year (November 1 to February 28) as per a variance granted under 6 NYCRR

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Part 234.3(h). When the catalytic oxidizer is not being used between November 1 and February 28 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.

The four (4) flexographic printing presses and the Regenerative Thermal Oxidizer in Emission Unit 0-00CFI at this facility are:

P2 - Prestige 806 Press, 6-color (Emission Source 000P2),

P5 - CMF Omat 808 Press (first), 8-color (Emission Source 000P5),

P6 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P6),

P7 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P7), and

RTO - 25,000 CFM ANGUIL ENV. SYSTEMS Model 250 RTO (Emission Control00008).

Nap Industries, Inc. has the following four printing presses and Regenerative Thermal Oxidizer:

Printing Press ES/C	PP ID	EP
Prestige 806 000P2	P2	00002
CMF Omat 808 000P5	P5	00005
Uteco Onyx 2295 000P6	P6	00006
Uteco Onyx 2295 000P7	P7	00007
Oxidizer (Emission Control) 00008		00008

Building(s): MAIN/ROOF

**Condition 22: Progress Reports Due Semiannually
Effective between the dates of 05/10/2017 and 05/09/2022**



Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)

Item 22.1:

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:

(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 23: Non Applicable requirements
Effective between the dates of 05/10/2017 and 05/09/2022**

Applicable Federal Requirement:6 NYCRR 201-6.4 (g)

Item 23.1:

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.

6 NYCRR 212-1.4 (p)

Reason: 212-1.4 (p) for Processes P01 and P02:

The exception states that "Graphic arts process operations subject to section 234.1 (a) of this Title and graphic arts process operations exempt from Part 234 of this Title pursuant to section 234.1 (d) of this Title, only with respect to emissions of VOCs that are not given an A rating. None of the VOCs emitted at the facility were given an environmental rating of A, therefore the requirements of Part 212 do no apply.

6 NYCRR Subpart 231-2

Reason: ROJECT DESCRIPTION:

The Title V permit renewal #3 application proposes the removal of the 6-color printing press (Emission Source (000P2) and in kind replacement of two (2) 8-color printing presses (Emission Sources 000P4 & 00P4A with Emission Sources 000P6 & 000P7). However; future emission potential will essentially remain unchanged as its production driven and subsequent emissions are effectively determined by operating hours. The VOC emission is capped at 113.31 Tons/year.

The proposed modification is based on 2014 and 2015 purchases and uses 89.5 TPY as the "past actual" emission



for the 2014-2015 baseline, which is the Post-Control Actuals with seasonal variance (oxidizer operating period). All the calculations are based on 90% VOC reduction during the period that the oxidizer is operating (seasonal variance).

Future Potential minus Past Actual (based on 8760 hours) =
(113.3 - 89.5) = 23.8 TPY

NETTING ANALYSIS:

Net Emission Increase (NEI) = Future PTE (based on 8,760 hrs/yr) - Past Actual = 113.31 TPY - 89.46 TPY = 23.85 TPY

SUBPART 231-2 APPLICABILITY ANALYSIS:

Based on the Subpart 231-2 Netting analysis, since the Net Emission Increase of VOC emission (23.85TPY) is less than the Significant Net Emission Increase Threshold (SNEIT) for a major source, the facility is not subject to Subpart 231-2.

Condition 24: Facility Permissible Emissions
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 24.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0

PTE: 226,620 pounds per year

Name: VOC

Condition 25: Capping Monitoring Condition
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 25.1:

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

6 NYCRR Subpart 231-2

Item 25.2:

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

Item 25.3:



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

Item 25.4:

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

Item 25.5:

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

Item 25.6:

The Compliance Certification activity will be performed for the Facility.

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

Item 25.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following.

The Total VOCs per year shall not exceed 226,620 pounds/year.

Parameter Monitored: VOC

Upper Permit Limit: 226620 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2018.

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

Condition 26: Air pollution prohibited
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 211.1

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Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

According to 6 NYCRR 234.3(b)(1)(i), 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 90 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 emissions are based on 90% VOC reduction during the period that the catalytic oxidizer is operating.

The requirements of 6NYCRR234.3(b)(1)(i) are as follows:

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

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

Manufacturer Name/Model Number: ANGUIL ENV. SYSTEMS Model 250 RTO

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from November 1 to February 28. The facility has been operating under this approval 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%.

Since 2007, the facility has increased the use of the facility's catalytic oxidizer under this seasonal variance (from 7 months to 8 months) under 6 NYCRR 234.3(h). The operation of the facility's catalytic oxidizer begins on March 1 and ends on October 31 of each 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: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2018.

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

Condition 31: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement: 6 NYCRR 234.4 (a)

Item 31.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00CFI Process: P01	Emission Point: 00008 Emission Source: 00008
Emission Unit: 0-00CFI Process: P01	Emission Point: 00002 Emission Source: 000P2
Emission Unit: 0-00CFI Process: P01	Emission Point: 00005 Emission Source: 000P5
Emission Unit: 0-00CFI Process: P01	Emission Point: 00006 Emission Source: 000P6
Emission Unit: 0-00CFI Process: P01	Emission Point: 00007 Emission Source: 000P7

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

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Permit ID: 2-6101-00016/00004

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

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

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

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

(2) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's walls, floor and ceiling.



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

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

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

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

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

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

The capture efficiency for the VOCs emitted during the printing process should be 100% based on permanent total room enclosure of the presses with negative room pressure in accordance with Method 204. The emission unit controls VOC emissions to the ambient air via catalytic oxidizer with a 91 % destruction efficiency (as per the last stack test result of May 28, 1997). Reasonable steps shall be taken to maximize the capture of VOC emissions from the VOC sources. Overall reduction shall be the combined efficiency of capture of VOC and destruction in the catalytic oxidizer. Therefore, the overall reduction in



volatile organic compounds (VOC) emissions as a result of the catalytic oxidizer shall be no less than 90%. An overall catalytic oxidizer's destruction efficiency of 90% for this facility shall be used for purposes of calculating HAPs and VOC emissions reduction when the control system is operating.

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

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

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: INK, AS APPLIED, INCLUDING SOLVENTS
Manufacturer Name/Model Number: ANGUIL ENV. SYSTEMS Model 250 RTO
Parameter Monitored: VOC
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 10/30/2017.
Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement: 6 NYCRR 234.4 (c)

Item 33.1:

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

Emission Unit: 0-00CFI
Process: P01

Emission Point: 00008
Emission Source: 00008

Emission Unit: 0-00CFI
Process: P01

Emission Point: 00002
Emission Source: 000P2



Emission Unit: 0-00CFI
Process: P01

Emission Point: 00005
Emission Source: 000P5

Emission Unit: 0-00CFI
Process: P01

Emission Point: 00006
Emission Source: 000P6

Emission Unit: 0-00CFI
Process: P01

Emission Point: 00007
Emission Source: 000P7

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

Item 33.2:

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(h). 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).

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.

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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 ENV. SYSTEMS Model 250 RTO

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 10/30/2017.

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

Condition 34: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 234.4 (c)

Item 34.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00CFI Process: P01	Emission Point: 00008 Emission Source: 00008
Emission Unit: 0-00CFI Process: P01	Emission Point: 00002 Emission Source: 000P2
Emission Unit: 0-00CFI Process: P01	Emission Point: 00005 Emission Source: 000P5
Emission Unit: 0-00CFI Process: P01	Emission Point: 00006 Emission Source: 000P6
Emission Unit: 0-00CFI Process: P01	Emission Point: 00007 Emission Source: 000P7

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

Item 34.2:

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.

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 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.

Manufacturer Name/Model Number: ANGUIL ENV. SYSTEMS Model 250 RTO

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 RANGE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2017.

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

Condition 35: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 234.4 (c)

Item 35.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00CFI
Process: P01

Emission Point: 00008
Emission Source: 00008

Emission Unit: 0-00CFI
Process: P01

Emission Point: 00002
Emission Source: 000P2

Emission Unit: 0-00CFI
Process: P01

Emission Point: 00005
Emission Source: 000P5

Emission Unit: 0-00CFI

Emission Point: 00006



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Process: P01 Emission Source: 000P6

Emission Unit: 0-00CFI Emission Point: 00007
Process: P01 Emission Source: 000P7

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:

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(h). 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 ENV. SYSTEMS Model 250 RTO

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 10/30/2017.

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

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Condition 36: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 234.6

Item 36.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

(c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2017.

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

Condition 37: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 234.7

Item 37.1:

The Compliance Certification activity will be performed for the Facility.

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



Item 37.2:

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 seasonal variance period and during the non- seasonal variance period. The HAPs emissions can be calculated using the two following formulas:

During the 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-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 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 10/30/2017.
Subsequent reports are due every 6 calendar month(s).

Condition 38: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 234.7

Item 38.1:
The Compliance Certification activity will be performed for the Facility.

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

Item 38.2:
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 seasonal variance period and during the non- seasonal variance period. The VOC emissions can be calculated using the two following formulas:

During the 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- 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

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VOC.

2. The quantity of the inks, thinners and solvents and any other material containing VOC used during the calendar month and year.
3. The VOC content of the inks, thinners and solvents and any other material containing VOC.

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

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

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2017.

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

Condition 39: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 234.7

Item 39.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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The results of an analysis or other procedure used to establish compliance with this Part must be provided to the Department. Department representatives shall be permitted, during reasonable business hours, to obtain ink, coating, adhesive, cleaning material and fountain solution samples to determine compliance with this Part.

The owner or operator of a graphic art facility which is not subject to the control requirements of this Part because its annual potential to emit VOC or its total actual VOC emissions, whichever applies is below the applicability criteria, must maintain records in a format acceptable to the Department that verify the facility's annual potential to emit VOC or its total actual VOC emissions. Upon request, these records must be submitted to the Department.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2018.
Subsequent reports are due every 12 calendar month(s).

Condition 40: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

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

Item 40.1:
The Compliance Certification activity will be performed for the Facility.

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

Item 40.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

To demonstrate that this facility will continue to be a

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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 # 35 that is associated with 6 NYCRR 234.4(b) 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 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 10/30/2017.

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

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

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Condition 41: Emission Point Definition By Emission Unit
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 41.1:

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

Emission Unit: 0-00CFI

Emission Point: 00002

Height (ft.): 50 Diameter (in.): 46
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: 00006

Height (ft.): 50 Diameter (in.): 46
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

Condition 42: Process Definition By Emission Unit
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 42.1:

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 four (4) flexographic printing presses (Emission Sources 00002, 00005, 00006 & 00007) in Emission Unit 0-00CFI that are used to print on packaging materials by applying solvent based inks to polyethylene sheeting. Each printing press is 50 inches and the emissions from the printing presses commonly duct/vent to a natural gas-fired catalytic oxidizer (Emission Control 00008). The catalytic thermal oxidizer (RTO) - Emission Control 00008 operates under a seasonal variance granted under 6 NYCRR Part 234.3(h) and is utilized between March



1 and October 31 each year (for 8-month period).

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.

The four (4) flexographic printing presses and the RTO in Emission Unit 0-00CFI at this facility are:

P2 - Prestige 806 Press, 6-color (Emission Source 000P2),

P5 - CMF Omat 808 Press, 8-color (Emission Source 000P5),

P6 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P6),

P7 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P1), and

RTO - 25,000 CFM ANGUIL ENV. SYSTEMS Model 250 Regenerative Thermal Oxidizer (Emission Control 00008).

Emission Source/Control: 00008 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

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

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

Emission Source/Control: 000P6 - Process
Design Capacity: 50 inches

Emission Source/Control: 000P7 - Process
Design Capacity: 50 inches

Item 42.2:

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 four (4) flexographic printing presses (Emission Sources 00002, 00005, 00006 &

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00007) used in Emission Unit 0-00CFI, are used between November 1 and February 28 yearly under a seasonal variance without the use of the catalytic oxidizer (Emission Control 00008). The printing presses are used to print on packaging materials by applying solvent based inks to polyethylene sheeting. Each printing press is 50 inches and has its own individual emission point (Emission Points 00002, 00005, 00006 & 00007; respectively), and the presses commonly duct/vent to the individual emission point between November 1 and February 28. The catalytic oxidizer is not being used for a four-month period by bypassing the catalytic oxidizer and venting directly to the atmosphere between November 1 and February 28.

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.

The four (4) flexographic printing presses in Emission Unit 0-00CFI at this facility are:

P2 - Prestige 806 Press, 6-color (Emission Source 000P2),

P5 - CMF Omat 808 Press, 8-color (Emission Source 000P5),

P6 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P6), and

P7 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P1).

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

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

Emission Source/Control: 000P6 - Process
Design Capacity: 50 inches

Emission Source/Control: 000P7 - Process
Design Capacity: 50 inches

Condition 43: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022



Applicable Federal Requirement: 6 NYCRR 234.4 (b)

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

One of the following test methods from appendix A of 40 CFR 60 (see Table 1, 6 NYCRR Part 200.9) must be used to measure the VOC concentration of a gas stream at the inlet and outlet of the control equipment:

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

(ii) Method 25, Determination of Total Gaseous Non-methane Organic Emissions as Carbon; or

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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2018.
Subsequent reports are due every 12 calendar month(s).

Condition 44: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement: 6 NYCRR 234.8

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Item 44.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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

NAP Industries, Inc. shall perform the following:

- 1) Observe each stack once per day while the presses are operating for visible emissions. These observations must be conducted during the daylight hours except during adverse weather conditions (fog, rain or snow).
- 2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded after each observation:
 - weather conditions
 - was a plume observed?

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

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

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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
Lower Permit Limit: 10 percent
Monitoring Frequency: DAILY
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2017.

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

Condition 45: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 234.8

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Item 45.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A person shall not cause or allow emissions having an average opacity of 10 percent or greater for any consecutive six minute period from any emission source subject to this Part into the outdoor atmosphere.

Parameter Monitored: OPACITY
Upper Permit Limit: 10 percent
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.

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The initial report is due 10/30/2017.
Subsequent reports are due every 6 calendar month(s).

Condition 46: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

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

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI
Process: P01

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

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A heat-set web offset lithographic printing process that uses ink, coating or adhesive containing VOC shall not operate if it: is located in a severe ozone non-attainment area; has an annual potential to emit VOC of 25 tons per year or more; or is located at a facility that has an annual potential to emit VOC of 50 tons per year or more, unless the control equipment provides for an overall removal efficiency of 90.0 percent or greater for control equipment that was first installed prior July 8, 2010.

Parameter Monitored: VOC

Lower Permit Limit: 90 percent reduction

Reference Test Method: Methods 18, 25 or 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 47: Compliance Certification
Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement:6 NYCRR 234.4 (a)

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI
Process: P01

Item 47.2:

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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 48: Compliance Certification

Effective between the dates of 05/10/2017 and 05/09/2022

Applicable Federal Requirement: 6 NYCRR 234.4 (c)

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

(1) Combustion zone temperature of all oxidizers;

(2) Inlet temperature at the catalytic oxidizer bed;

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

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

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2017.

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: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;

(3) During the period of the emergency the facility owner 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 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 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: 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

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

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

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

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

