



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 2-6101-00016/00004**  
**Renewal Number: 3**  
**05/15/2017**

**Facility Identification Data**

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

**Owner/Firm**

Name: N A P INDUSTRIES INC  
Address: 667 KENT AVE  
BROOKLYN, NY 11249, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

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**Permit Description**  
**Introduction**

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

**Summary Description of Proposed Project**

Application for renewal of Air Title V Facility.

This application is for the renewal of the Title V operating permit for NAP Industries, Inc., DEC ID #2-



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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 have remained essentially unchanged since Ren #2 was issued on 3/20/2012. The facility is a major source of VOC, but a minor source of Hazardous Air Pollutants (HAPs).

Operations & processes at this facility have remained essentially unchanged, however; some few equipment changes will occur under this permit renewal and have been detailed in the application.

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 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



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

**Attainment Status**

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

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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

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

**Facility Description:**

NAP Industries, Inc. is a flexographic printing facility using both aqueous-based and solvent-based inks applied to paper and film substrates. The facility creates VOC emissions that are currently processed through a natural gas- fired catalytic oxidizer with a seasonal variance operating between March 1 and October 31, with a destruction efficiency of 90% before emitting to the environment.

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, they are as follows:

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



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6-color press, and printing presses P5, P6 and P7 are 8-color each. The facility's regenerative thermal oxidizer (RTO) operates under a seasonal variance (from March 1 thru October 31).

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 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.

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.

**Permit Structure and Description of Operations**

The Title V permit for NAP - KENT AVENUE FACILITY

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

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

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

Emission unit 000CFI - 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, 000P6 & 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



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

Emission unit 000CFI is associated with the following emission points (EP):

00002, 00005, 00006, 00007, 00008

Process: P01 is located at 1ST, Building MAIN/ROOF - 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),



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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).

Process: P02 is located at 1ST, Building MAIN/ROOF - Process P02 consists of the same four (4) flexographic printing presses (Emission Sources 00002, 00005, 00006 & 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).

**Title V/Major Source Status**

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

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

**Program Applicability**

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

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

NOTES:

**PSD** Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NSR** New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NESHAP** National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

**MACT** Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

**NSPS** New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

**Title IV** Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

**Title VI** Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

**RACT** Reasonably Available Control Technology (6 NYCRR Parts 212-3, 226, 227-2, 228, 229,



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

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

**Compliance Status**

Facility is in compliance with all requirements.

**SIC Codes**

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

**SIC Code**

**Description**

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

**SCC Codes**

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

**SCC Code**

**Description**

4-05-003-11	PRINTING/PUBLISHING
	PRINTING/PUBLISHING - GENERAL
	PRINTING - FLOXOGRAPHIC

**Facility Emissions Summary**

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution





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control equipment and/or restrictions on the hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term ‘HAP’ refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000111-76-2	ETHANOL, 2-BUTOXY-	3097		2445	
0NY100-00-0	TOTAL HAP	3097		2445	
0NY998-00-0	VOC	226620		192600	

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**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 Part 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 Part 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 Part 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 Part 201-6.4(a)(3)**

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The



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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 Part 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 Part 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 Part 201-6.4(i)**

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be



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completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

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

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

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

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

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**



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**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\_02

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

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

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

**Regulatory Analysis**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
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FACILITY	ECL 19-0301	49	Powers and Duties of the Department with respect to air
FACILITY	40CFR 63-KK.829(d)	40	pollution control
FACILITY	40CFR 68	19	Printing and Publishing NESHAP-Recordkeeping
FACILITY	40CFR 82-F	20	Chemical accident prevention provisions
FACILITY	6NYCRR 200.6	1	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.7	10	Acceptable ambient air quality.
FACILITY	6NYCRR 201-1.4	50	Maintenance of equipment.
FACILITY	6NYCRR 201-1.7	11	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.8	12	Recycling and Salvage
FACILITY	6NYCRR 201-3.2(a)	13	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.3(a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	21, 41, 42	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.4(a)(4)	15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)(2)	4	Recordkeeping and Reporting of Compliance Monitoring Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-6.4(g)	23	Permit Shield
FACILITY	6NYCRR 201-7	24	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements -



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FACILITY	6NYCRR 211.1	26	record keeping requirements.
FACILITY	6NYCRR 215.2	9	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 234.1(c)	27	Open Fires - Prohibitions
FACILITY	6NYCRR 234.3(b)(1)(i)	28	Once in , always in Control requirements - Lithographic printing
0-00CFI/-/P01	6NYCRR 234.3(b)(1)(i)	46	Control requirements - Lithographic printing
FACILITY	6NYCRR 234.3(e)(1)(ii)	29	Control requirements - removal efficiency
FACILITY	6NYCRR 234.3(h)	30	Afterburner shutdown between November 1 and March 31
FACILITY	6NYCRR 234.4(a)	31, 32	Testing and monitoring methods
0-00CFI/-/P01	6NYCRR 234.4(a)	47	Testing and monitoring methods
0-00CFI	6NYCRR 234.4(b)	43	Testing and monitoring - test methods
FACILITY	6NYCRR 234.4(c)	33, 34, 35	Testing and monitoring - continuous monitoring requirements
0-00CFI/-/P01	6NYCRR 234.4(c)	48	Testing and monitoring - continuous monitoring requirements
FACILITY	6NYCRR 234.6	36	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 234.7	37, 38, 39	Recordkeeping requirements
0-00CFI	6NYCRR 234.8	44, 45	Opacity

**Applicability Discussion:**

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

ECL 19-0301

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

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an



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applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.



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6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

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

6 NYCRR 201-6.4 (c) (3) (ii)

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

6 NYCRR 201-6.4 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

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

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 201-6.4 (g)

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

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5





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

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

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

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

**Facility Specific Requirements**

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

40 CFR 63.829 (d)

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

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 234.1 (c)

This regulation states that a printing process that is subject to the provisions of this Part will remain subject to these provisions even if the emission of VOC from the facility or printing press later falls below the applicability criteria.



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6 NYCRR 234.3 (b) (1) (i)

This regulation requires that for heat-set web offset lithographic printing process or heat-set letterpress printing process that uses ink, coating or adhesive containing VOC shall not operate unless the control equipment provides for an overall removal efficiency of 90.0 percent or greater for control equipment that was first installed prior to July 8, 2010.

6 NYCRR 234.3 (e) (1) (ii)

This regulation requires screen printing processes to have a capture system and control equipment that provides a minimum overall removal efficiency of 80.0 percent.

6 NYCRR 234.3 (h)

For printing processes subject to this Part, the Department may allow sources that use control equipment with natural gas fired afterburners to shut down the natural gas fired afterburners from November 1st through March 31st for the purposes of natural gas conservation, provided that the commissioner has determined that this action will not jeopardize air quality.

6 NYCRR 234.4 (a)

This regulation requires that 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.

6 NYCRR 234.4 (b)

This regulation sets forth the testing methods and procedures to be used for facilities subject of the requirements of Part 234.

6 NYCRR 234.4 (c)

This regulation specifies that continuous monitoring equipment is required for the following: Combustion zone temperature of all oxidizers; inlet temperature at the catalytic oxidizer bed; break-through of VOC on a carbon adsorption unit; and any other



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continuous monitoring or recording device required by the Department.

6 NYCRR 234.6

This regulation specifies the following:

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.

6 NYCRR 234.7

This regulation sets forth the record keeping requirements for facilities subject of the requirements of Part 234.

6 NYCRR 234.8

This regulation requires that emissions from a unit subject to Part 234 shall not have an opacity greater than 10%.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is 226,620 pounds of VOC per year on a monthly rolling average basis.

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**



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<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>
FACILITY	6 NYCRR 212-1.4 (p)	Part 234 process emission sources with respect to A-rated VOC contaminants

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 not apply.

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

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified



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activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

**Compliance Certification**

**Summary of monitoring activities at NAP - KENT AVENUE FACILITY:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
FACILITY	40	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	28	intermittent emission testing
0-00CFI/-/P01	46	intermittent emission testing
FACILITY	29	intermittent emission testing
FACILITY	30	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures
FACILITY	32	work practice involving specific operations
0-00CFI/-/P01	47	record keeping/maintenance procedures
0-00CFI	43	record keeping/maintenance procedures
FACILITY	33	monitoring of process or control device parameters as surrogate
FACILITY	34	monitoring of process or control device parameters as surrogate
FACILITY	35	monitoring of process or control device parameters as surrogate
0-00CFI/-/P01	48	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
0-00CFI	44	monitoring of process or control device parameters as surrogate
0-00CFI	45	monitoring of process or control device parameters as surrogate

**Basis for Monitoring**

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

**6 NYCRR 201-6.4(c)(3)(ii):** This is a facility-wide condition. This condition specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

**6 NYCRR 201-6.4(e):** This is a facility-wide condition. This condition is for Recordkeeping/Maintenance Procedures and specifies the general requirements for compliance



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certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office addresses where the reports are to be sent.

**6 NYCRR 202-2.1:** This is a facility-wide condition. This condition is for Recordkeeping/Maintenance Procedures and sets forth the applicability criteria for submitting an annual statement of emissions. The criteria is based on annual emission threshold quantities and ozone attainment designation. This condition is a requirement for all Title V facilities. These facilities must submit an annual emission statement by April 15th of each year for emissions of the previous calendar year.

**6 NYCRR 234.3(b)(1)(i):** This condition is an emission unit, emission point, process and emission source/control level condition for EU: 0-00CFI, EP: 00002, 00005, 00006, 00007 & 00008, Process: P01 and Emission Source/control: 000P2, 000P5, 000P6, 000P7 & 00008 for VOC for Intermittent Emission Testing.

This condition requires that for heat-set web offset lithographic printing process or heat-set letterpress printing process that uses ink, coating or adhesive containing VOC shall not operate unless the control equipment provides for an overall removal efficiency of 90.0 percent or greater for control equipment that was first installed prior to July 8, 2010.

**6 NYCRR 234.3(e)(1)(ii):** This condition is an emission unit, emission point, process and emission source/control level condition for EU: 0-00CFI, EP: 00002, 00005, 00006, 00007 & 00008, Process: P01 and Emission Source/control: 000P2, 000P5, 000P6, 000P7 & 00008 for VOC for Intermittent Emission Testing.

This condition requires lithographic printing processes to have a capture system and control equipment that provides a minimum overall removal efficiency of 90.0 percent.

A 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, or is located in a facility that has an annual potential to emit VOC of 50 tons per year or more, unless the printing process uses as a control strategy for VOCs a capture system and control equipment that provides a minimum overall removal efficiency of 90.0 percent.

**6 NYCRR 234.3(h):** This condition is an emission unit, emission point, process and emission source/control level condition for EU: 0-00CFI, EP: 00002, 00005, 00006 & 00007, Process: P02 and Emission Source/control: 000P2, 000P5, 000P6 & 00007 for VOC for Record Keeping/Maintenance Procedures.

For printing processes subject to this Part, the Department may allow sources that use control equipment with natural gas fired afterburners to shut down the natural gas fired afterburners from November 1st through March 31st for the purposes of natural gas conservation, provided that the commissioner has determined that this action will not jeopardize air quality.

**6 NYCRR 234.4(a):** This condition is an emission unit, emission point, process and emission source/control level condition for EU: 0-00CFI, EP: 00002, 00005, 00006, 00007 & 00008, Process: P01 and Emission Source/control: 000P2, 000P5, 000P6, 00007 & 00008 for VOC for Record Keeping/Maintenance Procedures.

This condition requires that 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.

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



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

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

**6 NYCRR 234.4(a):** This condition is an emission unit, emission point, process and emission source/control level condition for EU: 0-00CFI, EP: 00002, 00005, 00006, 00007 & 00008, Process: P01 and Emission Source/control: 000P2, 000P5, 000P6, 00007 & 00008 for VOC for Work Practice Involving Specific Operations.

This condition requires that 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. 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.

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.



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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.

**6 NYCRR 234.4( c):** This condition is an emission unit, emission point, process and emission source/control level condition for EU: 0-00CFI, EP: 00002, 00005, 00006, 00007 & 00008, Process: P01 and Emission Source/control: 000P2, 000P5, 000P6, 00007 & 00008 for VOC for Monitoring of Process or Control Device Parameters as Surrogate.

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.

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).

**6 NYCRR 234.4( c):** This condition is an emission unit, emission point, process and emission source/control level condition for EU: 0-00CFI, EP: 00002, 00005, 00006, 00007 & 00008, Process: P01 and Emission Source/control: 000P2, 000P5, 000P6, 00007 & 00008 for VOC for Monitoring of Process or Control Device Parameters as Surrogate.

This condition specifies that continuous monitoring equipment is required for the following: Combustion zone temperature of all oxidizers; inlet temperature at the catalytic oxidizer bed; break-through of VOC on a carbon adsorption unit; and any other continuous monitoring or recording device required by the Department.

Any time that any of the flexographic printing presses is operating between March 1 and October 31, the catalytic oxidizer must be started and allowed to reach operating temperature (minimum of 550 degrees Fahrenheit) prior to starting the presses. According to the Anguil Environmental Systems Operation and Maintenance Manual for the catalytic oxidizer, if the presses are started before the catalytic oxidizer is at





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operating temperature, the solvent laden air from the printing operation will be automatically aborted to the atmosphere until the catalytic oxidizer attains operating temperature and comes on line.

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

**6 NYCRR 234.4( c):** This condition is an emission unit, emission point, process and emission source/control level condition for EU: 0-00CFI, EP: 00002, 00005, 00006, 00007 & 00008, Process: P01 and Emission Source/control: 000P2, 000P5, 000P6, 00007 & 00008 for VOC for Monitoring of Process or Control Device Parameters as Surrogate.

This condition specifies that continuous monitoring equipment is required for the following: Combustion zone temperature of all oxidizers; inlet temperature at the catalytic oxidizer bed; break-through of VOC on a carbon adsorption unit; and any other continuous monitoring or recording device required by the Department.

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;
- (3) Break-through of VOC on a carbon adsorption unit; and
- (4) Any other continuous monitoring or recording device required by the Department.

**6 NYCRR 234.6:** This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for VOC. This condition specifies the following:

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.

**6 NYCRR 234.7:** This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for Total HAP. This condition sets forth the record keeping requirements for facilities subject to the requirements of Part 234.

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:



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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.

**6 NYCRR 234.7:** This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for VOC. This condition sets forth the record keeping requirements for facilities subject to the requirements of Part 234.

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.

**6 NYCRR 234.7:** This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for VOC. This condition sets forth the record keeping requirements for facilities subject to the requirements of Part 234.

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.



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

**40 CFR 63.829(d), Subpart KK:** This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for Total HAP.

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

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.

**6 NYCRR 234.4(b):** This condition is an emission unit level condition for EU: 0-00CFI for VOC for Record Keeping/Maintenance Procedures.

This condition sets forth the testing methods and procedures to be used for facilities subject to the requirements of Part 234. 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.

**6 NYCRR 234.8:** This condition is an emission unit level for EU: 0-00CFI for Monitoring of Process or Control Device Parameters as Surrogate.

This condition requires that emissions from a unit subject to Part 234 shall not have an opacity greater than 10%. 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).



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

- weather conditions
- was a plume observed?

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

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

**6 NYCRR 234.8:** This condition is an emission unit level condition for EU: 0-00CFI for VOC for Monitoring of Process or Control Device Parameters as Surrogate.

This condition requires that emissions from a unit subject to Part 234 shall not have an opacity greater than 10%. 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.

**6 NYCRR 234.3(b)(1)(i):** This condition is an emission unit and process level condition for EU: 0-00CFI and Process: P01 for VOC for Intermittent Emission Testing.

This condition requires that for heat-set web offset lithographic printing process that uses ink, coating or adhesive containing VOC shall not operate unless the control equipment provides for an overall removal efficiency of 90.0 percent or greater for control equipment that was first installed prior to July 8, 2010.

**6 NYCRR 234.4(a):** This condition is an emission unit and process level condition for EU: 0-00CFI and Process: P01 for Record Keeping/Maintenance Procedures.

This condition requires that 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.

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.

**6 NYCRR 234.4(c):** This condition is an emission unit and process level condition for EU: 0-00CFI and Process: P01 for VOC for Monitoring of Process or Control Device Parameters as Surrogate.

This condition specifies that continuous monitoring equipment is required for the following: Combustion zone temperature of all oxidizers; inlet temperature at the catalytic oxidizer bed; break-through of VOC on



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a carbon adsorption unit; and any other continuous monitoring or recording device required by the Department.

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