

Facility DEC ID: 2610100016

**PERMIT
Under the Environmental Conservation Law (ECL)**

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 2-6101-00016/00004
Effective Date: 06/15/2022 Expiration Date: 06/14/2027

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 4)**

This is a renewal of the Title V operating permit for NAP Industries, Inc., DEC ID #2-6101-00016/00004 that was issued on 5/10/2017. The facility operates two (2) flexographic printing presses (Emission Sources 000P6 & 000P7), and one (1) natural gas fired catalytic oxidizer (Emission Control 00008) in Emission Unit 0-00CFI to produce flexible packaging materials. The catalytic oxidizer destroys the VOC emissions from each printing press during the period from March 1 to October 31 yearly (ozone season - Process P01). Process P02 is when the catalytic is not operated during the remaining part of the year (November 1 to February 28) during the non-ozone season as per a variance under 6 NYCRR Part 234.3(h). Process P02 is when the catalytic oxidizer is not being used, the emissions from each printing press are bypassing the catalytic oxidizer and are individually vented through individual emission points (00006 & 00007) directly to the atmosphere.

The facility is a major source of VOC, but a minor source of Hazardous Air

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Pollutants (HAPs). The VOC emissions remains capped at 113.31 Tons/year.

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.

NAP Industries, Inc. is a flexographic printing facility using both aqueous-based and solvent-based inks applied to paper and film/polyethylene substrate rolled sheeting producing material for a variety of commercial and industrial packaging applications. Normal operations include a 5-day work week, 12 hours/day for Monday through Friday with a total of 60 hours per week during this period. The facility creates VOC emissions that are currently processed through a natural gas- fired catalytic oxidizer with an approved VOC seasonal variance operating between March 1 and October 31, with a destruction efficiency of 90% before emitting to the environment.

The Title V Permit Renewal #4 involves the removal of two (2) printing presses (Emission Sources 000P2 & 000P5) with corresponding Emission Points 000P2 & 000P5). Both printing presses are 50 inches each and to be ducted (Process P01) to a newly replaced (2/10/2017) 25,000 CFM ANGUIL ENV. SYSTEMS Model 250 Regenerative Thermal Oxidizer - RTO (Emission Control 00008) all under Emission Unit 0-00CFI. The removal of the (2) printing presses will result in a decrease in the facility's PTE; therefore, the facility is not subject to New Source Review or Part 231-2.2.

On 7/1/2017, the following two presses were removed from the facility:

P2 - Prestige 806 Press, 6-color (Emission Source 000P2 with corresponding Emission Point 00002.

P5 - CMF Omat 808 (first), 8-color (Emission Source 000P5 with corresponding Emission Point 00005.

The old RTO - The 10,000 CFM RTO ANGUIL ENV. SYSTEMS/100 Regenerative Thermal Oxidizer (Emission Control 00001) was removed on 1/10/2017, and was replaced with a new RTO (Emission Control 00008), which was installed on 1/10/2017 and began operating on 2/10/2017.

The two (2) flexographic printing presses and RTO in Emission Unit 0-00CFI to produce flexible packaging materials at this facility are:

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P6 - Uteco Onyx 2687 Press, 8-color (Emission Source 000P6) with corresponding Emission Point 00006.

P7 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P7), with corresponding Emission Point 00007.

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

Both flexographic printing presses are 50 inches each and are with gas-fired dryers. Printing presses P6 and P7 are 8-color each. Their corresponding regenerative thermal oxidizer (RTO) operates under its 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). The VOC emissions remains capped at 113.31 Tons/year. The annual facility VOC emissions have steadily decreased from 87.2 tons in 2016 to 49.5 tons in 2020 as summarized below:

Year	Actual VOC Emissions
2016	87.2
2017	68.0
2018	73.0
2019	54.0
2020	49.5

The Title V permit contains a complete listing of the applicable federal, state and compliance monitoring requirements for the facility, its emission units and emission points. This permit renewal does not add, remove or change in any way the applicable and pertinent regulations of the existing Title V permit, including record keeping and reporting requirements.

The facility's potential emissions for volatile organic compounds exceed the major source threshold for Title V applicability. As such, the facility is subject

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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 to the environment for an overall removal efficiency of at least 90 %. 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) natural gas fired space heaters (each unit < 10 MM Btu/hr), one (1) ventilation system for flammable ink storage room, and seventeen (17) bag processing machines.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

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

Authorized Signature: _____ Date: ___ / ___ / ___

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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.

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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

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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

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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

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- 9 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 11 6 6 NYCRR 201-6.4 (e): Compliance Certification
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- 13 8 6 NYCRR 202-2.5: Recordkeeping requirements
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- 38 39 6 NYCRR 234.4 (b): Compliance Certification
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40 41 6 NYCRR 234.8: Compliance Certification

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41 42 6 NYCRR 234.3 (b) (1) (i): Compliance Certification

42 43 6 NYCRR 234.4 (a): Compliance Certification

42 44 6 NYCRR 234.4 (c): Compliance Certification

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45 45 ECL 19-0301: Contaminant List

45 46 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities

46 47 6 NYCRR 211.1: Air pollution prohibited

NOTE: * preceding the condition number indicates capping.

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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 4/FINAL

**** 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

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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

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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 the requirement 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

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

Item 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 06/15/2022 and 06/14/2027

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

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contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees

Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 3: Recordkeeping and Reporting of Compliance Monitoring

Effective between the dates of 06/15/2022 and 06/14/2027

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

Item 3.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii)The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

Condition 4: Records of Monitoring, Sampling, and Measurement

Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all

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reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

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,

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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

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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 10/30/2022.
 Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

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 – Air Compliance Branch
USEPA Region 2 DECA/ACB
290 Broadway, 21st Floor
New York, NY 10007

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:

NYSDEC
Bureau of Quality Assurance

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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 4/30/2023.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

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 0 days after the reporting period.
The initial report is due 4/15/2023.
Subsequent reports are due every 12 calendar month(s).

Condition 8: Recordkeeping requirements
Effective between the dates of 06/15/2022 and 06/14/2027

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

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Effective between the dates of 06/15/2022 and 06/14/2027

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.

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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

Condition 11: Recycling and Salvage
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 06/15/2022 and 06/14/2027

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

Item 13.1:

The owner or operator of an emission source or activity that is listed as being exempt may be

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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 records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 06/15/2022 and 06/14/2027

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 06/15/2022 and 06/14/2027

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 06/15/2022 and 06/14/2027

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

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

Condition 17: Required Emissions Tests
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 17.1:

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 18: Accidental release provisions.
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:40 CFR Part 68

Item 18.1:

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

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

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

Condition 19: Recycling and Emissions Reduction
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:40CFR 82, Subpart F

Item 19.1:

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

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

Condition 20: Emission Unit Definition

Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement: 6 NYCRR Subpart 201-6**Item 20.1:**

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 two (2) 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 (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 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 two presses) are bypassing the catalytic oxidizer and are individually vented through individual emission points directly to the atmosphere.

The two (2) flexographic printing presses and the Regenerative Thermal Oxidizer in Emission Unit 0-00CFI at this facility are:

P6 - Uteco Onyx 2687 Press, 8-color (Emission Source 000P6) with corresponding Emission Point 00006 ,

P7 - Uteco Onyx 2295 Press, 8-color (Emission Source 000P7) with corresponding Emission Point 00007, and

RTO - 25,000 CFM ANGUIL ENV. SYSTEMS Model 250 RTO (Emission Control 00008) with corresponding Emission Point 00008.

Building(s): MAIN/ROOF

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Condition 21: Progress Reports Due Semiannually
Effective between the dates of 06/15/2022 and 06/14/2027

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

Item 21.1:

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 22: Operational Flexibility
Effective between the dates of 06/15/2022 and 06/14/2027

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

Item 22.1:

A permit modification is not required for changes that are provided for in the permit. Such changes include approved alternate operating scenarios and changes that have been submitted and approved pursuant to an established operational flexibility protocol and the requirements of this section. Each such change cannot be a modification under any provision of Title I of the Clean Air Act or exceed, or cause the facility to exceed, an emissions cap or limitation in the permit. The facility owner or operator must incorporate all changes into any compliance certifications, record keeping, and/or reporting required by the permit.

Condition 23: Non Applicable requirements
Effective between the dates of 06/15/2022 and 06/14/2027

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 Part 212
 Reason: Part 212 for Processes P01 and P02:

Part 212 is not applicable to this graphic arts facility for Processes P01 & P02 because none of the VOCs emitted by this facility were given an "A" rating. So, Part 212.1-4 (p) applies for the exception to Part 234.

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Condition 24: Facility Permissible Emissions
Effective between the dates of 06/15/2022 and 06/14/2027

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
Name: VOC

PTE: 226,620 pounds per year

Condition 25: Capping Monitoring Condition
Effective between the dates of 06/15/2022 and 06/14/2027

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:

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.

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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 or 113.31 tons per year.

To demonstrate compliance, the facility is to record and keep ink and solvent purchases and/or usage records of all inks and solvents used monthly on a computer spread sheet, and perform a monthly and rolling 12-month total VOC calculations to demonstrate compliance with the 226,620 pounds/year or 113.31 tons per year limit.

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

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

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

The facility should record the amount of VOC used and the emissions of VOC (taking into account the destruction

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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.

The facility will demonstrate compliance with the 113.31 tons per year VOCs cap by keeping monthly records of all VOCs used. The facility must keep records for a minimum of five years.

Parameter Monitored: VOC
 Upper Permit Limit: 226620 pounds per year
 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 10/30/2022.
 Subsequent reports are due every 6 calendar month(s).

Condition 26: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 26.1:
 The Compliance Certification activity will be performed for the facility:
 The Compliance Certification applies to:

Emission Unit: 0-00CFI	Emission Point: 00008
Process: P01	Emission Source: 00008

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Emission Unit: 0-00CFI
Process: P01

Emission Point: 00006
Emission Source: 000P6

Emission Unit: 0-00CFI
Process: P01

Emission Point: 00007
Emission Source: 000P7

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To maintain 100 % capture efficiency, NAP Industries shall operate the Permanent Total Enclosure criteria outlined in 40 CFR 51, Appendix M. Method 24, at any time any printing press is operating.

This can be achieved or met by:

1. having the face velocity (FV) of air through all NDO's (natural draft opening) shall be at least 200 ft/min. The direction of all air flow through all NDO's shall be in the enclosure measuring the FV (face velocity), or
2. having the process room be enclosed and under negative static pressure relative to the rest of the building, adequate to prevent the uncontrolled release of air from the process room during all weather conditions. Negative pressure will be monitored via a differential pressure transmitter, or other technology acceptable to the Department, which will activate the sound of an alarm to alert nearby workers to remind them to close the door, and alert the facility's operator in the control room each time the negative pressure is compromised.

Reference Test Method: 40 CFR 51, Appendix M, Method 204

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 4/15/2023.

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

Condition 27: Visible Emissions Limited
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 211.2

Item 27.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute

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average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 28: Once in, always in
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 234.1 (c)

Item 28.1:

A printing process that is subject to the provisions of Part 234 will remain subject to these provisions even if the emission of VOC from the facility or printing press later falls below the applicability criteria.

Condition 29: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 234.3 (h)

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility may shut down the natural gas fired afterburners, used to control emissions from printing processes subject to this Part, from November 1st through February 28th for the purposes of natural gas conservation. This does not excuse the facility from adhering to other emission limits included in this permit. The afterburners shall be returned to service (a) in order to ensure compliance with other permitted emission limits or (b) if the Department makes a determination that air quality is jeopardized.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2022.

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

Condition 30: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 234.4 (a)

Item 30.1:

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

Emission Unit: 0-00CFI Emission Point: 00008
Process: P01 Emission Source: 00008
Emission Unit: 0-00CFI Emission Point: 00006
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 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2022.

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

Condition 31: Compliance Certification

Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 234.4 (a)

Item 31.1:

The Compliance Certification activity will be performed for the facility:

Permit ID: 2-6101-00016/00004

Facility DEC ID: 2610100016

The Compliance Certification applies to:

Emission Unit: 0-00CFI	Emission Point: 00008
Process: P01	Emission Source: 00008

Emission Unit: 0-00CFI	Emission Point: 00006
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 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

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. 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,

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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.

(8) an operating parameter (e. g. pressure drop across the permanent enclosure) should be established during the stack test. This established pressure drop will be periodically monitored so the facility can demonstrate continuous compliance with the required 100 % capture efficiency. See related condition # 17 for 6 NYCRR 202-2.1.

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. 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

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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. 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.

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: Once every five years

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 10/30/2022.

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

Condition 32: Compliance Certification

Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement: 6 NYCRR 234.4 (c)

Permit ID: 2-6101-00016/00004

Facility DEC ID: 2610100016

Item 32.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00CFI	Emission Point: 00008
Process: P01	Emission Source: 00008
Emission Unit: 0-00CFI	Emission Point: 00006
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 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Inspection and Maintenance of the Catalytic Oxidizer Bed:

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.

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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.

Manufacturer Name/Model Number: ANGUIL ENV. SYSTEMS Model 250 RTO
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2022.

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

Condition 33: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

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	Emission Point: 00008
Process: P01	Emission Source: 00008
Emission Unit: 0-00CFI	Emission Point: 00006
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 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

Permit ID: 2-6101-00016/00004

Facility DEC ID: 2610100016

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 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 continuously monitored, calibrated, and measured by a sensing device and recorded respectively 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. 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 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 which measures the inlet, the exhaust and the catalytic bed temperatures, shall be installed, periodically calibrated, operated, and continuously monitored according to the manufacturer's specifications, at all times the catalytic oxidizer is operating (between March 1 and October 31).

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

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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
 Monitoring Frequency: CONTINUOUS
 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 10/30/2022.
 Subsequent reports are due every 6 calendar month(s).

Condition 34: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 234.6

Item 34.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 34.2:

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.

Permit ID: 2-6101-00016/00004

Facility DEC ID: 2610100016

The initial report is due 10/30/2022.
Subsequent reports are due every 6 calendar month(s).

Condition 35: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement: 6 NYCRR 234.7

Item 35.1:
The Compliance Certification activity will be performed for the Facility.

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

Item 35.2:
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.

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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 10/30/2022.
Subsequent reports are due every 6 calendar month(s).

Permit ID: 2-6101-00016/00004

Facility DEC ID: 2610100016

Condition 36: Compliance Certification

Effective between the dates of 06/15/2022 and 06/14/2027

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

Item 36.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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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.

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 the permit condition 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 HAP 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

Monitoring Frequency: MONTHLY
 Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 10/30/2022.
 Subsequent reports are due every 6 calendar month(s).

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

**Condition 37: Emission Point Definition By Emission Unit
 Effective between the dates of 06/15/2022 and 06/14/2027**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Permit ID: 2-6101-00016/00004

Facility DEC ID: 2610100016

Item 37.1:

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

Removal Date: 07/01/2017

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 38: Process Definition By Emission Unit
 Effective between the dates of 06/15/2022 and 06/14/2027**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 38.1:

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 two (2) flexographic printing presses (Emission Sources 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 5-day work week during this period. The operating schedule calls for operation of 12 hours/day for Monday through Friday (60 hours). Total operating hours/week = 60 hours/week.

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The two (2) flexographic printing presses and the RTO in Emission Unit 0-00CFI at this facility are:

P6 - Uteco Onyx 2687 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: 000P6 - Process
Design Capacity: 50 inches

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

Item 38.2:

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 two (2) flexographic printing presses (Emission Sources 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 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 5-day work week during this period. The operating schedule calls for operation of 12 hours/day for Monday through Friday (60 hours). Total operating hours/week = 60 hours/week.

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Facility DEC ID: 2610100016

The two (2) flexographic printing presses in Emission Unit 0-00CFI at this facility are:

P6 - Uteco Onyx 2687 Press, 8-color (Emission Source 000P6), and

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

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

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

Condition 39: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement: 6 NYCRR 234.4 (b)

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

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:

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 I, 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.

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Facility DEC ID: 2610100016

(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 I, 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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2022.

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

Condition 40: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement: 6 NYCRR 234.8

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Item 40.2:

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

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bound logbook or other format acceptable to the Department. The following data must be recorded after each observation:

- weather conditions
- was a plume observed?

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

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

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

Parameter Monitored: OPACITY
Lower 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.
The initial report is due 10/30/2022.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement: 6 NYCRR 234.8

Item 41.1:
The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Permit ID: 2-6101-00016/00004

Facility DEC ID: 2610100016

Item 41.2:

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.

The initial report is due 10/30/2022.

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

Condition 42: Compliance Certification

Effective between the dates of 06/15/2022 and 06/14/2027

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

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 42.2:

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

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Reference Test Method: Methods 18, 25 or 25A

Monitoring Frequency: Once every five years

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 43: Compliance Certification

Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 234.4 (a)

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P01

Item 43.2:

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 44: Compliance Certification

Effective between the dates of 06/15/2022 and 06/14/2027

Applicable Federal Requirement:6 NYCRR 234.4 (c)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-00CFI

Process: P01

Permit ID: 2-6101-00016/00004

Facility DEC ID: 2610100016

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

Item 44.2:

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;
- (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 10/30/2022.

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

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Facility DEC ID: 2610100016

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 in 6 NYCRR 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 demonstrate, 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 facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction 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

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criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 45: Contaminant List

Effective between the dates of 06/15/2022 and 06/14/2027

Applicable State Requirement: ECL 19-0301

Item 45.1:

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

CAS No: 0NY100-00-0
Name: TOTAL HAP

CAS No: 0NY998-00-0
Name: VOC

Condition 46: Malfunctions and Start-up/Shutdown Activities

Effective between the dates of 06/15/2022 and 06/14/2027

Applicable State Requirement: 6 NYCRR 201-1.4

Item 46.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance

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of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, 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 monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall 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. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. 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, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility 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.

Condition 47: Air pollution prohibited
Effective between the dates of 06/15/2022 and 06/14/2027

Applicable State Requirement:6 NYCRR 211.1

Item 47.1:

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

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