

New York State Department of Environmental Conservation
Facility DEC ID: 8261400205



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

PAir State Facility

Permit ID: 8-2614-00205/01837

Effective Date: 04/01/2005

Expiration Date: No expiration date

Permit Issued To: EASTMAN KODAK CO
343 STATE STREET
ROCHESTER, NY 14650

Contact: R. HAYS BELL
HEALTH, SAFETY & ENVIRONMENT
1100 RIDGEWAY AVE BLDG 320
ROCHESTER, NY 14652-6256

Facility: KODAK PARK DIVISION
1669 LAKE AVE
ROCHESTER, NY 14650

Contact: MICHAEL ZAPKIN
KODAK HEALTH SAFETY & ENVIRONMENT
1100 RIDGEWAY AVE BLDG 320
ROCHESTER, NY 14652-6263
(585) 722-5827

Description:

This permit authorizes the construction and initial operation of emission sources associated with a new emission unit, Emission Unit U-00086, at the Kodak Park facility. The machine will be housed in a new building that will be constructed adjacent to existing Building 325. The emission sources covered by this emission unit will include a new gravure printing machine to produce media for use in photographic operations and other operations which support this new machine. In addition to the new machine, the permit allows construction of the following: new equipment and parts cleaning units; modification of existing and installation of new equipment for solution preparation and delivery to the machine; new equipment for media finishing operations; new equipment for solvent recovery; and installation of a regenerative thermal oxidizer (RTO) to control emissions of Volatile Organic Compounds (VOC) from the printing machine and solvent recovery still.

Kodak is required to submit a complete application to modify the Kodak Park Title V Facility Permit (8-2614-00205/01801) within one year of the initial operation of the new gravure printing machine. Until the Title V Facility Permit is modified, the preconstruction state facility permit will allow Kodak to operate the new gravure printing machine for the purposes of commissioning the new equipment and then to undertake the required performance testing of the RTO. Prior to the performance test, the RTO will be operated under the manufacturer's specifications. Following the completion of the performance testing,

FINAL

New York State Department of Environmental Conservation
Facility DEC ID: 8261400205



6274 EAST AVON LIMA RD
AVON, NY 14414-9519

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 8
HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
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 and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



New York State Department of Environmental Conservation
Facility DEC ID: 8261400205

transfer of ownership.

Condition 4: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 4.1:

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

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

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 8 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(716) 226-2466



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: EASTMAN KODAK CO
343 STATE STREET
ROCHESTER, NY 14650

Facility: KODAK PARK DIVISION
1669 LAKE AVE
ROCHESTER, NY 14650

Authorized Activity By Standard Industrial Classification Code:
3861 - PHOTOGRAPH EQUIPMENT & SUPPLIES



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Emission Unit Level

EU=U-00086

1 40CFR 52.21, Subpart A: Compliance Demonstration

EU=U-00086,Proc=J50

- 2 6NYCRR 228.3(c): Solids as applied
- 3 6NYCRR 228.5(a): Compliance Demonstration
- 4 6NYCRR 228.5(b): Use of Methods 311 or 24.
- 5 6NYCRR 228.5(c): Compliance Demonstration
- 6 6NYCRR 228.5(d): Department access to obtain samples.
- 7 6NYCRR 228.5(g): Compliance Demonstration
- 8 6NYCRR 228.6: Compliance Demonstration
- 9 6NYCRR 228.10: Compliance Demonstration
- 10 40CFR 63.823, Subpart KK: Part 63 General Provisions requirements
- 11 40CFR 63.825(b)(7), Subpart KK: Control requirements for product and packaging rotogravure or wide-web flexographic presses
- 12 40CFR 63.825(f)(3), Subpart KK: Monitoring of capture system and control device parameters
- 13 40CFR 63.825(f)(7), Subpart KK: Compliance Demonstration
- 14 40CFR 63.825(g), Subpart KK: Compliance Demonstration
- 15 40CFR 63.826(b), Subpart KK: Compliance date for a new affected source
- 16 40CFR 63.827(b)(2), Subpart KK: Compliance Demonstration
- 17 40CFR 63.828(a), Subpart KK: Compliance Demonstration
- 18 40CFR 63.828(a)(2)(ii), Subpart KK: Calibration of temperature monitoring equipment
- 19 40CFR 63.828(a)(4)(i), Subpart KK: Monitoring Requirements for an Oxidizer (other than catalytic)
- 20 40CFR 63.828(a)(5), Subpart KK: Compliance Demonstration
- 21 40CFR 63.829(b), Subpart KK: Compliance Demonstration
- 22 40CFR 63.830(b)(1)(ii), Subpart KK: Initial Notification requirement for new and reconstructed sources
- 23 40CFR 63.830(b)(2), Subpart KK: Notification of performance test
- 24 40CFR 63.830(b)(3), Subpart KK: Notification of compliance status
- 25 40CFR 63.830(b)(4), Subpart KK: Compliance Demonstration
- 26 40CFR 63.830(b)(5), Subpart KK: Compliance Demonstration
- 27 40CFR 63.830(b)(6), Subpart KK: Compliance Demonstration

EU=U-00086,Proc=J50,ES=330AA

- 28 40CFR 63.827(d), Subpart KK: Compliance Demonstration
- 29 40CFR 63.827(e)(1), Subpart KK: Procedure for determining capture efficiency



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

30 40CFR 64: Compliance Demonstration

EU=U-00086,Proc=J54,ES=330AB

31 6NYCRR 226: Compliance Demonstration

EU=U-00086,Proc=J56

32 6NYCRR 229.3(e)(2)(v): Compliance Demonstration

33 6NYCRR 229.5(d): Compliance Demonstration

EU=U-00086,EP=325X4,Proc=J51

34 6NYCRR 212.10(c)(4)(iii): Compliance Demonstration

EU=U-00086,EP=326B8,Proc=J55,ES=326AG

35 6NYCRR 212.4(c): Compliance Demonstration

36 6NYCRR 212.6(a): Compliance Demonstration

EU=U-00086,EP=33001

37 6NYCRR 212.10(f): Compliance Demonstration

38 6NYCRR 212.10(f): Compliance Demonstration

39 6NYCRR 212.10(f): Compliance Demonstration

EU=U-00086,EP=33001,Proc=J50,ES=330AA

40 6NYCRR 228.4: Compliance Demonstration

EU=U-00086,EP=33001,Proc=J53,ES=330AE

41 6NYCRR 212.10(c)(4)(i): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

42 ECL 19-0301: Contaminant List

43 6NYCRR 201-1.4: Unavoidable noncompliance and violations

44 6NYCRR 201-5: Emission Unit Definition

45 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

46 6NYCRR 201-5: Emission Point Definition By Emission Unit

47 6NYCRR 201-5: Process Definition By Emission Unit

48 6NYCRR 201-7: Emission Unit Permissible Emissions

EU=U-00086

*49 6NYCRR 201-7: Capping Monitoring Condition

EU=U-00086,Proc=J53,ES=330AE

50 6NYCRR 212.4(a): Emissions from new emission sources and/or
modifications

EU=U-00086,EP=325X4



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

51 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

EU=U-00086,EP=330X1

52 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

NOTE: * preceding the condition number indicates capping.
Permit Effective Date: 04/01/2005 Permit Expiration Date: No expiration date.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6NYCRR Part 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

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

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



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.

Item D: Unpermitted Emission Sources - 6NYCRR Part 201-1.2

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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

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

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

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

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

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

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

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

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item L: Open Fires - 6 NYCRR Part 215

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

Item M: 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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

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 N: 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.

FEDERAL APPLICABLE REQUIREMENTS

The following conditions are federally enforceable.

Condition 1: Compliance Demonstration

Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 52.21, Subpart A

Item 1.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



Review (NSR) requirements, annual emissions of VOC from EU U-00086 shall not exceed 39.9 tpy, on a rolling twelve month basis. To demonstrate compliance with this cap, Kodak shall conduct a performance test on the Regenerative Thermal Oxidizer (RTO)(Control ID 33001) to verify that the VOC removal efficiency is 99% or greater. The performance test shall be conducted within 180 days of the RTO startup. Results shall be submitted to NYSDEC within 60 days of completing the performance test.

Following the performance test, each three-hour block average combustion temperature within the RTO combustion chamber shall be continuously monitored and maintained at or above the temperature established by the performance test. Prior to the performance test, Kodak shall operate the RTO in accordance with manufacturer's specifications.

The sum of VOC emissions from printing and coating operations; solution preparation and delivery operations; waste solvent and recoverable solvent handling; solvent storage tanks and solvent cleaning operations shall be recorded for each month. Emission calculations shall be based on (1) VOC emission factors (lbs/hr) to be determined during the Performance Test on the RTO and operating records for the printing and coating operations (ES 330AA) and the solvent recovery still (ES 330AE), (2) working loss (displacement) calculations for the solution preparation and delivery operations (ES 325AU), (3) breathing and working loss calculations for solvent storage tanks (ES 325AV), (4) records reflecting the total monthly quantity of VOCs used for cleaning (ES 330AB and ES 330AC), and (5) working loss (displacement) calculations for spent solvents transferred from these Emission Sources to the Building 325 Waste and Recoverable Solvent Tanks (ES 325AL) in Kodak Park Title V Emission Unit U-00002).

Emissions calculations will assume 100 percent capture efficiency of the printing machine's total enclosure (ES 330AA) and the solvent recovery still (ES 330AE). Therefore, Kodak shall maintain the solvent recovery still and associated equipment to ensure 100% capture of VOC emissions.

If the performance test on the RTO indicates a VOC removal



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

efficiency of less than 99%, Kodak shall comply with additional operating limits, such as limitation of batch solution preparation and delivery operations, to ensure that the cap is not exceeded. These operating limits would be based on the demonstrated control efficiency and subject to the approval of the Department. Records shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 8/29/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 2: Solids as applied
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(c)

Item 2.1:
This Condition applies to Emission Unit: U-00086
Process: J50

Item 2.2:
The overall removal efficiency of an air cleaning device used as a control strategy must be determined, for every surface coating formulation, on a solids as applied basis using Equation 2 unless a 85 percent of greater overall removal efficiency is achieved by the air cleaning device. The air cleaning device must be designed and operated to provide, at a minimum, an overall removal efficiency of either 85 percent or as determined by Equation 2.

$$n = \left[1 - \frac{(VOC)c(Vn)a}{(VOC)a(Vn)c} \right] \times 100\% \quad \text{Equation 2}$$

where:

n is the overall removal efficiency

(VOC)c is the maximum permissible pounds of VOC per gallon of coating minus water and excluded VOC at application, as set forth in tables 1 and 2 of 6 NYCRR 228.

(VOC)a is the VOC content of an as applied coating, expressed as pounds of VOC per gallon of coating minus water and excluded VOC

(Vn)c is the volumetric fraction of solids, expressed as gallon of solids per gallon of coating minus water and excluded VOC, in a compliant coating expressed as:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



$$(V_n)_c = 1 - (V_v)_c \quad \text{Equation 3}$$

$(V_v)_c$ is the volumetric fraction of VOC, expressed as gallon of VOC per gallon of coating minus water and excluded VOC, in a compliant coating expressed as:

$$(V_v)_c = \frac{(VOC)_c}{d_{voc}} \quad \text{Equation 4}$$

$(V_n)_a$ is the volumetric fraction of solids, expressed as gallon of solids per gallon of coating minus water and excluded VOC, in an as applied coating expressed as:

$$(V_n)_a = 1 - (V_v)_a \quad \text{Equation 5}$$

$(V_v)_a$ is the volumetric fraction of VOC, expressed as gallon of VOC per gallon of coating minus water and excluded VOC, in an as applied coating expressed as:

$$(V_v)_a = \frac{(VOC)_a}{dVOC} \quad \text{Equation 6}$$

$dVOC$ is the density of VOC as applied, i.e., total volatiles minus water and excluded VOC, in pounds of VOC per gallon of VOC

Condition 3: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086
Process: J50

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

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

the Department with a certification from the coating supplier/manufacture which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the Department and, upon request, these records must be submitted to the Department. Any facility required to perform the overall removal efficiency calculation, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance must be provided to the Department in a format acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

Condition 4: Use of Methods 311 or 24.
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(b)

Item 4.1:

This Condition applies to Emission Unit: U-00086
Process: J50

Item 4.2:

Upon request by the Department, the owner and operator of any emission source subject to 6NYCRR Part 228, must use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, respectively (see table 1, section 200.9 of Title 6), to measure the volatile content, water content, density, volume of solids, and weight of solids in order to determine the actual VOC content of an as applied coating during a compliance demonstration.

Condition 5: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(c)

Item 5.1:

The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



Emission Unit: U-00086

Process: J50

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

When the sampling and analysis methods referenced in subdivisions (b) or (f) or paragraph (e)(2) of 6 NYCRR 228.5 are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the Department and the Administrator.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

**Condition 6: Department access to obtain samples.
Effective between the dates of 04/01/2005 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 228.5(d)

Item 6.1:

This Condition applies to Emission Unit: U-00086

Process: J50

Item 6.2:

Representatives of the Department must be permitted during reasonable business hours, to obtain coating samples for the purpose of determining compliance with 6NYCRR Part 228.

**Condition 7: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 228.5(g)

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Process: J50

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In order to maintain compliance with 6NYCRR Part 228 Surface Coating and 6 NYCRR Part 212 VOC RACT requirements Kodak shall operate a Regenerative Thermal Oxidizer (RTO)(Control ID 33001), achieving at least 85% removal efficiency of VOCs. Kodak shall demonstrate compliance by conducting a performance test on the RTO to verify that the control device achieves at least 85% removal efficiency. The performance test shall be conducted within 180 days of the RTO start-up. Results shall be submitted to NYSDEC within 60 days of completing the performance test.

Continuous monitors of the combustion/retention chamber temperature of the RTO shall be installed, periodically calibrated, and operated at all times that the RTO is operating. Following the performance test, each three-hour block average combustion temperature within the RTO combustion chamber shall be continuously monitored and maintained at or above the temperature established by the performance test. Prior to the performance test, Kodak shall operate the RTO in accordance with the manufacturer's specifications.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 85 percent

Reference Test Method: EPA METHOD 25

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

Condition 8: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



Applicable Federal Requirement: 6NYCRR 228.6

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086

Process: J50

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(A) No person shall sell, specify, or require for use the application of a coating on a part or product at a facility with a coating line described in table 1 or 2 in section 228.7 or 228.8 of 6 NYCRR 228 if such use is prohibited by any of the provisions of this Part. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at this facility. This prohibition shall not apply to the following:

(1) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in tables 1 and 2 of sections 228.7 or 228.8 of 6 NYCRR Part 228;

(2) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in section 228.3(d) of 6 NYCRR Part 228; and

(3) coatings utilized at surface coating lines that have been granted variances for reasons of technological and economic feasibility per section 228.3(e) of 6 NYCRR Part 228.

(B) Any person selling a coating for use in a coating line subject to this Part must, upon request, provide the user with certification of the VOC content of the coating

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



supplied.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

Condition 9: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086

Process: J50

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Part must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters,

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

(g) beginning on January 1, 2005, clean spray guns used to apply mobile equipment repair and refinishing or color-matched coatings by one of the following:

(1) an enclosed spray gun cleaning system that is kept closed when not in use;

(2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

(3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or

(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

**Condition 10: Part 63 General Provisions requirements
Effective between the dates of 04/01/2005 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 63.823, Subpart KK

Item 10.1:

This Condition applies to Emission Unit: U-00086
Process: J50

Item 10.2:

Table 1 to 40CFR63 Subpart KK provides cross references to the 40CFR Part 63 Subpart A, General



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Provisions, indicating the applicability of the General Provisions requirements to Subpart KK.

Condition 11: Control requirements for product and packaging rotogravure or wide-web flexographic presses
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.825(b)(7), Subpart KK

Item 11.1:

This Condition applies to Emission Unit: U-00086
Process: J50

Item 11.2:

The owner or operator of a product and packaging rotogravure or a wide-web flexographic printing press that is utilizing a control device to comply with subpart KK shall operate the capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95% for each month.

Monitoring of the control device must be performed in accordance with specifications described in Subpart KK.

Condition 12: Monitoring of capture system and control device parameters
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.825(f)(3), Subpart KK

Item 12.1:

This Condition applies to Emission Unit: U-00086
Process: J50

Item 12.2:

The owner or operator of each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance through performance tests of capture efficiency and control device efficiency and continuous compliance through continuous monitoring of capture system and control device operating parameters shall:

1. Monitor an operating parameter established in accordance with section 63.828(a)(4) to assure control device efficiency, and
2. For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in accordance with section 63.828(a)(5) to assure capture efficiency, and
3. Determine the organic HAP emissions for those presses served by each capture system delivering emissions to that oxidizer according to the requirements of 40CFR63.825(f)(3)(iii)(A) or (B).

Condition 13: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.825(f)(7), Subpart KK

Item 13.1:



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086

Process: J50

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Organic HAP emissions shall be determined for the affected source for the month by summing all organic HAP emissions calculated according to §63.825(f)(1), (f)(2)(ii), (f)(3)(iii), (f)(4)(ii), and (f)(5). The affected source is in compliance for the month if all operating parameters required to be monitored under §63.825(f)(2)-(4) were maintained at the appropriate values, and the total mass of organic HAP emitted by the affected source was not more than 5% of the total mass of organic HAP applied by the affected source. The total mass of organic HAP applied by the affected source in the month shall be determined by the owner/operator using Equation 8.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

Condition 14: Compliance Demonstration

Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.825(g), Subpart KK

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086

Process: J50

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For purposes of determining organic HAP emissions from a press or group of presses having one or more intermittently-controllable work stations and using the procedures specified in paragraphs (f)(1)(ii), (f)(2)(ii)(B), (f)(3)(iii)(B), or (f)(4)(ii)(B) of this section, Kodak shall for that press or group of presses:

1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode during the month, MBi.

(2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode during the month, MBj.

(3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode during the month, MBj.

(4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode during the month, MCj.

(5) For each press or group of presses for which the owner or operator uses the provisions of paragraphs (f)(2)(ii)(B), (f)(3)(iii)(B), or (f)(4)(ii)(B) of this section, Kodak shall calculate the organic HAP emitted during the month using Equation (19).

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



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

Condition 15: Compliance date for a new affected source
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.826(b), Subpart KK

Item 15.1:

This Condition applies to Emission Unit: U-00086
Process: J50

Item 15.2:

The compliance date for a facility with a new affected source subject to the provisions of 40CFR63, Subpart KK is immediately upon startup of the affected source, or May 30, 1996, whichever is later.

Condition 16: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.827(b)(2), Subpart KK

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086
Process: J50

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

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each facility with a product and packaging rotogravure or wide-web flexographic printing facility shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following one of the following procedures:

1) Testing the material in accordance with Method 311 of appendix A of 40CFR63. The Method 311 determination may be performed by the manufacturer of the material and the results provided to the facility. If these values cannot be determined using Method 311, the facility shall submit an alternative technique for determining their values for

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



approval by EPA. The recovery efficiency of the technique must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.

2) The facility may determine the volatile matter content of the material in accordance with §63.827(c)(2) and use this value for the organic HAP content for all compliance purposes.

3) The facility may rely on formulation data provided by the manufacturer of the material on a Certified Product Data Sheet (CPDS) if the manufacturer has included in the organic HAP content determination all HAP present at a level greater than 0.1% in any raw material used, weighted by the mass fraction of each raw material used in the material, and the manufacturer has determined the HAP content of each raw material present in the formulation by Method 311 of 40CFR63, Appendix A, or by an alternative method approved by EPA, or by reliance on a CPDS from a raw material supplier prepared in accordance with this condition.

In the event that the Method 311 test value is higher than the formulation data, the Method 311 test data shall govern, unless after consultation, a facility demonstrates to the satisfaction of NYSDEC that the formulation data are correct.

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

Condition 17: Compliance Demonstration

Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.828(a), Subpart KK

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086

Process: J50



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Following the date on which the initial performance test of a control device is completed, Kodak shall follow the procedures in paragraphs (a)(1)(iv) of this section. For each dryer associated with the product and packaging rotogravure press with intermittently-controllable work stations, Kodak shall use an automatic shutdown system in which the press is stopped when flow is diverted away from the control device to any bypass line. The automatic system shall be inspected at least once every month to ensure that it is functioning properly.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

**Condition 18: Calibration of temperature monitoring equipment
Effective between the dates of 04/01/2005 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 63.828(a)(2)(ii), Subpart KK

Item 18.1:

This Condition applies to Emission Unit: U-00086

Process: J50

Item 18.2:

All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced.

The replacement shall be done either if the owner chooses not to perform the calibration or if the equipment can not be calibrated properly.

**Condition 19: Monitoring Requirements for an Oxidizer (other than catalytic)
Effective between the dates of 04/01/2005 and Permit Expiration Date**

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



Applicable Federal Requirement: 40CFR 63.828(a)(4)(i), Subpart KK

Item 19.1:

This Condition applies to Emission Unit: U-00086
Process: J50

Item 19.2:

An owner or operator complying with the requirements of §§ 63.824-63.825 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall for an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ± 1 percent of the temperature being monitored in $^{\circ}\text{C}$ or ± 1 $^{\circ}\text{C}$, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

Condition 20: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.828(a)(5), Subpart KK

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086
Process: J50

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

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator complying with the requirements of sections 63.824-63.825 through the use of a control device and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained shall:

1. Submit to the Administrator with the compliance status report required by section 63.9(h) of the General Provisions, a plan that:

A) Identifies the operating parameter to be monitored to

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



ensure that the capture efficiency measured during the initial compliance test is maintained,

B) Discusses why this parameter is appropriate for demonstrating ongoing compliance, and

C) Identifies the specific monitoring procedures;

2. Set the operating parameter value, or range of values, that demonstrate compliance with sections 63.824-63.825, and

3. Conduct monitoring in accordance with the plan submitted to the Administrator unless comments received from the Administrator require an alternative monitoring scheme.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

Condition 21: Compliance Demonstration

Effective between the dates of 04/01/2005 and Permit Expiration Date

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

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086

Process: J50

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to 40CFR Part 63 Subpart KK shall maintain the following records (as specified in paragraphs (b)(1) through (b)(3) of Section 63.829) on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1):



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

(1) Records specified in 40CFR63.10(b)(2), of all measurements needed to demonstrate compliance with Subpart KK, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

(2) Records specified in 40CFR63.10(b)(3), for each applicability determination performed by the owner or operator in accordance with the requirement in 40CFR63.820(a), and

(3) Records specified in 40CFR63.10(c) for each continuous monitoring system operated by the owner or operator in accordance with the requirements of 40CFR63.828(a).

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

Condition 22: Initial Notification requirement for new and reconstructed sources
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.830(b)(1)(ii), Subpart KK

Item 22.1:

This Condition applies to Emission Unit: U-00086
Process: J50

Item 22.2: Initial Notifications for new and reconstructed sources shall be submitted as required by 40CFR63.9(b).

Condition 23: Notification of performance test
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.830(b)(2), Subpart KK

Item 23.1:

This Condition applies to Emission Unit: U-00086
Process: J50

Item 23.2:



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Each owner or operator of an affected source subject to 40CFR63 Subpart KK shall submit a Notification of Performance Test, as specified in Section 63.7 and Section 63.9(e) of 40CFR Part 63.

This notification, and the site-specific test plan required under Section 63.7(c)(2), shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.

Condition 24: Notification of compliance status
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.830(b)(3), Subpart KK

Item 24.1:

This Condition applies to Emission Unit: U-00086
Process: J50

Item 24.2:

Each owner or operator of an affected source subject to 40CFR63 Subpart KK shall submit a Notification of Compliance Status, as specified in 40CFR63.9(h), to the Department.

Condition 25: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.830(b)(4), Subpart KK

Item 25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086
Process: J50

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

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to 40CFR63 Subpart KK shall submit Performance Test Reports, as specified in 40CFR 63.10(d)(2), to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 8/29/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 26: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.830(b)(5), Subpart KK

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086
Process: J50

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to 40CFR63 Subpart KK that is using a control device to comply with Subpart KK shall submit start-up, shutdown, and malfunction reports as specified in Section 63.10(d)(5).

The start-up, shutdown, and malfunction report shall be submitted semiannually. The report shall be delivered or postmarked by the 30th day following the end of each calendar half. Reports shall only be required if a start-up, shutdown, or malfunction occurred during the reporting period.

If actions taken by an owner or operator during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in Section 63.6(e)(3), the owner or operator shall state such information in the report. The start-up, shutdown, or malfunction plan shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that shall be submitted to the Department.

Separate start-up, shutdown, or malfunction reports are



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

not required if the information is included in the semiannual report for the affected source

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 8/29/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.830(b)(6), Subpart KK

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086
Process: J50

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

Item 27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to 40CFR63 Subpart KK shall submit a Summary Report, as specified in 40CFR63.10(e)(3), on a semi-annual basis. In addition to a report of operating parameter exceedances as required by Section 63.10(e)(3)(i), the summary report shall include exceedances of the standards in Sections 63.824-63.825.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 8/29/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 28: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.827(d), Subpart KK



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086

Process: J50

Emission Source: 330AA

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In order to demonstrate compliance with 40 CFR 63 Subpart KK MACT requirements, Kodak shall conduct a performance test on the Regenerative Thermal Oxidizer (Control ID 33001) to verify that the control device achieves at least 95% removal efficiency. The performance test shall be conducted within 180 days of the Regenerative Thermal Oxidizer startup. Results shall be submitted to NYSDEC within 60 days of completing the performance test.

Thereafter, each three-hour block average combustion temperature within the Regenerative Thermal Oxidizer combustion chamber shall be continuously monitored and maintained at or above the temperature established by the performance test. Prior to the performance test, Kodak shall operate the Regenerative Thermal Oxidizer in accordance with manufacturer's specifications.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 95 percent

Reference Test Method: EPA METHOD 25

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

**Condition 29: Procedure for determining capture efficiency
Effective between the dates of 04/01/2005 and Permit Expiration Date**



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Applicable Federal Requirement: 40CFR 63.827(e)(1), Subpart KK

Item 29.1:

This Condition applies to Emission Unit: U-00086
Process: J50 Emission Source: 330AA

Item 29.2:

A performance test to determine the capture efficiency of each capture system venting organic emissions to a control device, for the purpose of meeting the requirements of sections 63.824(b)(1)(ii), 63.824(b)(2), 63.825(c)(2), 63.825(d)(1)-(2), 63.825(f)(2)-(4), or 63.825(h)(2)-(3), shall be conducted by the owner or operator.

For Permanent Total Enclosures, capture efficiency shall be assumed as 100 percent. Procedure T-"Criteria for the Verification of a Permanent or Temporary Total Enclosure", as found in appendix B to 40CFR52.741, shall be used to confirm that an enclosure meets the requirements for Permanent Total Enclosure.

Condition 30: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 64

Item 30.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086
Process: J50 Emission Source: 330AA

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

Item 30.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The rotogravure printing machine (ES 330AA) is subject to CAM with respect to Volatile Organic Compounds (VOC) emissions subject to Part 212 and Part 228, complying with these VOC RACT requirements through the use of a Regenerative Thermal Oxidizer (RTO) (Control ID 33001). Since the post control VOC Potential to Emit (PTE) is less than the major source threshold, this source qualifies as an "other pollutant-specific emission unit" under the CAM rule. As such, Kodak shall provide the required CAM information as part of the renewal application for the Kodak Park Title V permit as stipulated in 40 CFR

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



64.5(b).

Monitoring Frequency: UPON PERMIT RENEWAL

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 31: Compliance Demonstration

Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 226

Item 31.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086

Process: J54

Emission Source: 330AB

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 31.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for Cold Cleaning Degreasers

A. Equipment Specifications

The following types of control equipment must be used when conducting cold cleaning degreasing, solvent metal cleaning:

(1) A cover which can be operated easily.

(2) An internal drainage facility (under cover), if practical.

(3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. This does not apply to remote reservoir degreasers.

(4) Vapor pressure requirements of paragraph 226.3(a)(4) do not apply to this degreaser as long as the degreaser is located in a permanent total enclosure having control equipment that is designed and operated with an overall VOC removal efficiency of 90 percent or greater.

B. Operating Requirements:

When cold cleaning, the clean parts must be drained at least 15 seconds or until dripping ceases.



C. General Requirements:

A Person conducting solvent metal cleaning must:

- (1) Store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.
- (2) Maintain equipment to minimize leaks and fugitive emissions.
- (3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
- (4) Keep the degreaser cover closed except when:
 - (a) parts are being placed into or being removed from the degreaser;
 - (b) adding or removing solvent from the degreaser;
 - (c) no solvent is in the degreaser; or
 - (d) when manually cleaning metal parts in the cold cleaning degreaser.
- (5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
- (6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.
- (7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this requirement.
 - (a) the name and address of the solvent supplier;
 - (b) the type of solvent including the product or vendor identification number; and
 - (c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 F).

D. Record Keeping Requirements:

Deviations from these requirements shall be recorded in a log maintained for this purpose within the corresponding operating area and shall be appropriately identified in the semi-annual monitoring report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 8/29/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(v)

Item 32.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086
Process: J56

Item 32.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 8/29/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 229.5(d)

Item 33.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086
Process: J56



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

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

Item 33.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2006.

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

Condition 34: Compliance Demonstration

Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)

Item 34.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086 Emission Point: 325X4
Process: J51

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

Item 34.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission sources in this process are subject to 6 NYCRR Part 212.10 Reasonably Available Control Technology (RACT) requirements for emissions of Volatile Organic Compounds (VOC). The RACT determination is to be re-evaluated every five years. Based on the current evaluation, dated December 2004, annual emissions of VOC from the Solution Preparation and Delivery Operations (ES 325AU) shall not exceed 2.6 tpy on a rolling 12-month basis. VOC emissions shall be calculated monthly and incorporated into a



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

12-month rolling total. VOCs shall be calculated using displacement calculations and production records. Records shall be kept on site for five years and made available to the Department upon request.

The RACT determination shall be re-evaluated and submitted to the Department every five years from the date this State Facility Permit was issued.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

Condition 35: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 35.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086 Emission Point: 326B8
Process: J55 Emission Source: 326AG

Item 35.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 8/29/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 36: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 36.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086 Emission Point: 326B8
Process: J55 Emission Source: 326AG

Item 36.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

Condition 37: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.10(f)

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



Item 37.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086 Emission Point: 33001

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 37.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212.10 NOx RACT requirements, the Regenerative Thermal Oxidizer (Control ID 33001) shall not operate without the use of Low-NOx burners. The burner system and its NOx reduction components shall be operated and maintained according to design specifications. Modifications which may result in NOx emissions increases shall not be performed without prior approval from the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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

Condition 38: Compliance Demonstration

Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.10(f)

Item 38.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086 Emission Point: 33001

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 38.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212.10 NOx RACT requirements, annual emissions of Nitrogen Oxides (NOx) from Emission Point 33001 shall not exceed 18.8 tpy, on a twelve month rolling basis. Emissions shall be calculated using operating records of the hours of operation of the Regenerative Thermal Oxidizer (RTO)(Control ID 33001) and the NOx emission rate (lbs/hr) established by the NOx performance test conducted within 180 days of the RTO startup. Changes to the NOx emission rate due to an operational change or recalculation of emission rates shall be provided to the Department within 30 days of such a change. The RACT determination shall be reviewed every five years from the date this State Facility Permit was issued.

Prior to the test, emissions shall be calculated using operating records of the hours of operation of the RTO and a NOx emission rate of 4.3 lbs/hr, based on the maximum vendor guarantee for low-NOx burners on a similar unit installed at Kodak's KCD facility in Colorado.

Records shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 8/29/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 39: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.10(f)

Item 39.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086 Emission Point: 33001

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 39.2:



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212.10 NO_x RACT requirements, Kodak shall conduct a performance test on the Regenerative Thermal oxidizer (Control ID 33001) to establish the maximum NO_x emission rate (lbs/hr). The performance test shall be conducted within 180 days of the Regenerative Thermal Oxidizer startup. Results shall be submitted to NYSDEC within 60 days of completing the performance test.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 40: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.4

Item 40.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086 Emission Point: 33001
Process: J50 Emission Source: 330AA

Item 40.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 8/29/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Demonstration
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)

Item 41.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00086 Emission Point: 33001
Process: J53 Emission Source: 330AE

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

Item 41.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



In order to maintain compliance with 6 NYCRR Part 212 VOC RACT requirements Kodak shall operate a Regenerative Thermal Oxidizer (RTO)(Control ID 33001), achieving at least 81% removal efficiency of VOCs. Kodak shall demonstrate compliance by conducting a performance test on the RTO to verify that the control device achieves at least 81% removal efficiency. The performance test shall be conducted within 180 days of the RTO start-up. Results shall be submitted to NYSDEC within 60 days of completing the performance test.

Continuous monitors of the combustion/retention chamber temperature of the RTO shall be installed, periodically calibrated, and operated at all times that the RTO is operating. Following the performance test, each three-hour block average combustion temperature within the RTO combustion chamber shall be continuously monitored and maintained at or above the temperature established by the performance test. Prior to the performance test, Kodak shall operate the RTO in accordance with the manufacturer's specifications.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 81 percent

Reference Test Method: EPA METHOD 25

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2005.

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



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6NYCRR Part 201-1.10(a)

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1) , and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

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

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

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 42: Contaminant List
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 42.1:

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: HAP

CAS No: 0NY210-00-0
Name: OXIDES OF NITROGEN

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

Condition 43: Unavoidable noncompliance and violations
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 43.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

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

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

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

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 44: Emission Unit Definition
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 44.1:

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

Emission Unit: U-00086

Emission Unit Description:

WEB PRINTING INCLUDING SOLUTION PREPARATION AND DELIVERY; PRINTING, COATING & DRYING OPERATIONS; MEDIA FINISHING; EQUIPMENT & PARTS CLEANING; SOLVENT RECOVERY AND ASSOCIATED FUGITIVE EMISSIONS.

Building(s): 325

326

330

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



Condition 45: Air pollution prohibited
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 45.1:

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.

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

Condition 46: Emission Point Definition By Emission Unit
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 46.1:

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

| | | | |
|-----------------|---------|-----------------|---------------|
| Emission Unit: | U-00086 | | |
| Emission Point: | 325X4 | | |
| Height (ft.): | 35 | Diameter (in.): | 2 |
| | | | Building: 325 |
| Emission Point: | 325X5 | | |
| Height (ft.): | 35 | Diameter (in.): | 2 |
| | | | Building: 325 |
| Emission Point: | 326B8 | | |
| Height (ft.): | 67 | Diameter (in.): | 12 |
| | | | Building: 326 |
| Emission Point: | 33001 | | |
| Height (ft.): | 75 | Diameter (in.): | 80 |
| | | | Building: 330 |
| Emission Point: | 33002 | | |
| Height (ft.): | 48 | Diameter (in.): | 12 |
| | | | Building: 330 |

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



Emission Point: 330X1

Height (ft.): 48

Diameter (in.): 2

Building: 330

Condition 47: Process Definition By Emission Unit
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 47.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00086

Process: J50

Source Classification Code: 4-05-005-01

Process Description:

GRAVURE PRINTING AND DRYING WITH MACT
APPLICABILITY

Emission Source/Control: 33001 - Control

Control Type: DIRECT FLAME AFTERBURNER WITH HEAT
EXCHANGER

Emission Source/Control: 330AA - Process

Item 47.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00086

Process: J51

Source Classification Code: 4-05-005-01

Process Description: SOLUTION PREPARATION AND DELIVERY OPERATIONS

Emission Source/Control: 325AU - Process

Item 47.3:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00086

Process: J52

Source Classification Code: 4-05-005-01

Process Description: R& D GRAVURE PRINTING AND DRYING

Emission Source/Control: 330AA - Process

Item 47.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00086



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Process: J53

Source Classification Code: 4-90-002-99

Process Description:

WASTE (HAZ) SOLVENT & RECOVERABLE (VOL)
SOLVENT HANDLING

Emission Source/Control: 33001 - Control

Control Type: DIRECT FLAME AFTERBURNER WITH HEAT
EXCHANGER

Emission Source/Control: 330AE - Process

Item 47.5:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00086

Process: J54

Source Classification Code: 3-16-120-03

Process Description:

CLEANING OF PRINTING SOLUTION APPLICATION
EQUIPMENT AND COATING MACHINE PARTS

Emission Source/Control: 330AB - Process

Emission Source/Control: 330AC - Process

Item 47.6:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00086

Process: J55

Source Classification Code: 3-16-060-01

Process Description: THERMAL MEDIA FINISHING OPERATIONS

Emission Source/Control: 326AG - Process

Item 47.7:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00086

Process: J56

Source Classification Code: 3-16-130-01

Process Description: SOLVENT STORAGE TANKS SUBJECT TO 6NYCRR PART 229

Emission Source/Control: 325AV - Process

Condition 48: Emission Unit Permissible Emissions

Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Item 48.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: U-00086

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 79,800 pounds per year

Condition 49: Capping Monitoring Condition
Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 49.1:

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:

6NYCRR 231-2

40CFR 52-A.21

Item 49.2:

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

Item 49.3:

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 49.4:

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 49.5:

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

Item 49.6:

The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205



Emission Unit: U-00086

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 49.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to limit emissions below applicability thresholds for both 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231-2 New Source Review (NSR) requirements, annual emissions of VOC from EU U-00086 shall not exceed 39.9 tpy, on a rolling twelve month basis. To demonstrate compliance with this cap, Kodak shall conduct a performance test on the Regenerative Thermal Oxidizer (RTO)(Control ID 33001) to verify that the VOC removal efficiency is 99% or greater. The performance test shall be conducted within 180 days of the RTO startup. Results shall be submitted to NYSDEC within 60 days of completing the performance test.

Following the performance test, each three-hour block average combustion temperature within the RTO combustion chamber shall be continuously monitored and maintained at or above the temperature established by the performance test. Prior to the performance test, Kodak shall operate the RTO in accordance with manufacturer's specifications.

The sum of VOC emissions from printing and coating operations; solution preparation and delivery operations; waste solvent and recoverable solvent handling; solvent storage tanks and solvent cleaning operations shall be recorded for each month. Emission calculations shall be based on (1) VOC emission factors (lbs/hr) to be determined during the Performance Test on the RTO and operating records for the printing and coating operations (ES 330AA) and the solvent recovery still (ES 330AE), (2) working loss (displacement) calculations for the solution preparation and delivery operations (ES 325AU), (3) breathing and working loss calculations for solvent storage tanks (ES 325AV), (4) records reflecting the total



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

monthly quantity of VOCs used for cleaning (ES 330AB and ES 330AC), and (5) working loss (displacement) calculations for spent solvents transferred from these Emission Sources to the Building 325 Waste and Recoverable Solvent Tanks (ES 325AL) in Kodak Park Title V Emission Unit U-00002).

Emissions calculations will assume 100 percent capture efficiency of the printing machine's total enclosure (ES 330AA) and the solvent recovery still (ES 330AE). Therefore, Kodak shall maintain the solvent recovery still and associated equipment to ensure 100% capture of VOC emissions.

If the performance test on the RTO indicates a VOC removal efficiency of less than 99%, Kodak shall comply with additional operating limits, such as limitation of batch solution preparation and delivery operations, to ensure that the cap is not exceeded. These operating limits would be based on the demonstrated control efficiency and subject to the approval of the Department. Records shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 8/29/2005.
Subsequent reports are due every 6 calendar month(s).

**Condition 50: Emissions from new emission sources and/or modifications
Effective between the dates of 04/01/2005 and Permit Expiration Date**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 50.1:

This Condition applies to Emission Unit: U-00086
Process: J53 Emission Source: 330AE

Item 50.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 51: Emissions from new emission sources and/or modifications



New York State Department of Environmental Conservation

Permit ID: 8-2614-00205/01837

Facility DEC ID: 8261400205

Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 212.4(a)

Item 51.1:

This Condition applies to Emission Unit: U-00086 Emission Point: 325X4

Item 51.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 52: Emissions from new emission sources and/or modifications

Effective between the dates of 04/01/2005 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 212.4(a)

Item 52.1:

This Condition applies to Emission Unit: U-00086 Emission Point: 330X1

Item 52.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.