

New York State Department of Environmental Conservation
Facility DEC ID: 8261400823



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 8-2614-00823/00001
Effective Date: 04/30/2007 Expiration Date: 04/29/2012

Permit Issued To: CARESTREAM HEALTH INC
150 VERONA ST
ROCHESTER, NY 14608

Contact: JAMES M QUINN
CARESTREAM HEALTH INC
150 VERONA ST
ROCHESTER, NY 14608
(585) 724-2479

Facility: CARESTREAM HEALTH INC - HEALTH IMAGING FACILITY
1049 WEST RIDGE RD
ROCHESTER, NY 14615

Contact: CAVAN A KELSEY
CARESTREAM HEALTH INC
150 VERONA ST
ROCHESTER, NY 14608
(585) 724-3603

Description:

This is a new Title V Facility Permit for former Kodak Park Health Imaging manufacturing and research operations, previously authorized by Eastman Kodak's - Kodak Park Title V Facility Permit, Mod 2, issued on 2/7/2007. This separate Title V Facility Permit reflects the transfer of Health Imaging operations from Eastman Kodak Co to Carestream Health Inc, creating a new Title V Facility. The new Permit includes former Kodak sources in Emission Units U-00040, U-00069, two emission sources in Emission Unit U-00016, seven sources in U-00083, and one source in F-AC001. The Health Imaging operations are located in Buildings 214, 6, 12, 14, 28, 35, 42, 59, 65, 69, 81, 82, 117, and 320 in Kodak Park.

The Carestream Health Inc - Health Imaging Facility is subject to 6 NYCRR Part 201-6 (Title V) regulations due to emissions of volatile organic compounds (VOC) greater than 50 tons per year.

Operations include a coating line emission source subject to 40 CFR 63 Subpart JJJJ, the Paper and Other Webs MACT rule. When operated by Kodak, the coating line was compliant under facility-wide averaging of Hazardous Air Pollutant (HAP) content of coatings throughout Kodak Park. It is now no longer included in Kodak's coating average, but current EPA policy is that it remains subject to Subpart JJJJ as part of the new Carestream Health Inc - Health Imaging Facility.

New York State Department of Environmental Conservation
Facility DEC ID: 8261400823



Kodak had proposed restricting Health Imaging HAP emissions to less than 25 tons per year total HAP and less than 10 tons per year of any single HAP, the MACT threshold of applicability in 40 CFR Part 63. However, the new facility's coating line remains subject to 40 CFR 63 Subpart JJJJ.

This Title V Facility Permit authorizes Carestream Health Inc - Health Imaging Facility operations, with permit conditions to restrict HAP emissions to below the 40 CFR 63 threshold indicated above, as an interim limit.

For Subpart JJJJ compliance, a schedule is included in this Permit for the installation of emission control equipment on the Carestream Health Inc - Health Imaging Facility coating line, with the HAP limits above to apply in the interim, prior to emission control equipment installation and operation as specified in the Permit. EPA is considering a possible rule revision which may affect the need for control equipment.

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

Permit Administrator: PETER A LENT
DIVISION OF ENVIRONMENTAL PERMITS
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, modifications and transfers

Applications for Permit Renewals and Modifications

Permit modifications, suspensions or revocations by the Department

Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of application for permit modification or renewal-REGION 8
HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:



New York State Department of Environmental Conservation
Facility DEC ID: 8261400823

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

Condition 4: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 4.1:

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 4.2:

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 4.3:

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

Condition 5: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 5.1:

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.

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

Item 6.1:

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;

New York State Department of Environmental Conservation
Facility DEC ID: 8261400823



- 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 7: Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)

Item 7.1:

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: 8-2614-00823/00001

Facility DEC ID: 8261400823

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: CARESTREAM HEALTH INC
150 VERONA ST
ROCHESTER, NY 14608

Facility: CARESTREAM HEALTH INC - HEALTH IMAGING FACILITY
1049 WEST RIDGE RD
ROCHESTER, NY 14615

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

Permit Effective Date: 04/30/2007

Permit Expiration Date: 04/29/2012



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 200.3: False statement
- 24 6NYCRR 201-6: Compliance Schedule for Unpermitted Sources
- 25 6NYCRR 201-6: Emission Unit Definition
- 26 6NYCRR 201-6.5(f): Compliance Certification
- 27 6NYCRR 207: Submittal of Episode Action Plans
- 28 6NYCRR 212.5(e): Sources meeting Federal requirements, satisfy Part 212 compliance for regulated contaminant
- 29 6NYCRR 228.1(d): Will remain subject
- 30 6NYCRR 228.1(e)(13): Compliance Certification
- 31 40CFR 61, NESHAP Subpart M: National Emission Standard for Asbestos
- 32 40CFR 63, Subpart JJJJ: Paper and Other Web Coating MACT Compliance Schedule

Emission Unit Level

- 33 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 34 6NYCRR 201-6: Process Definition By Emission Unit

EU=F-AC001



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

35 6NYCRR 226: Compliance Certification

36 6NYCRR 226: Compliance Certification

EU=U-00016,EP=082X3,Proc=S11,ES=082AX

37 6NYCRR 212.4(c): Compliance Certification

38 6NYCRR 212.6(a): Compliance Certification

EU=U-00016,EP=082X4,Proc=S11,ES=082AY

39 6NYCRR 212.4(c): Compliance Certification

40 6NYCRR 212.6(a): Compliance Certification

EU=U-00040

41 6NYCRR 201-6.5(f)(1): Compliance Certification

EU=U-00040,Proc=J02

42 6NYCRR 228.3(d): Compliance Certification

43 6NYCRR 228.5(c): Compliance Certification

44 6NYCRR 228.5(d): Department access to obtain samples.

45 6NYCRR 228.6(a): Prohibition of sale.

46 6NYCRR 228.6(b): Compliance Certification

47 6NYCRR 228.7: Compliance Certification

48 6NYCRR 228.10: Compliance Certification

EU=U-00040,Proc=J05

49 6NYCRR 226: Compliance Certification

50 40CFR 63.460(b), Subpart T: Part 63 General Provisions requirements

51 40CFR 63.462(a)(2), Subpart T: Batch Cold Cleaning Machine Standards

52 40CFR 63.462(c), Subpart T: Compliance Certification

53 40CFR 63.462(d), Subpart T: Batch Cold Cleaning Machine Standards

EU=U-00040,Proc=J09

54 6NYCRR 226: Compliance Certification

EU=U-00040,EP=01413,Proc=J08,ES=014AJ

55 6NYCRR 212.4(c): Compliance Certification

56 6NYCRR 212.6(a): Compliance Certification

EU=U-00040,EP=01426,Proc=J02

57 6NYCRR 228.4: Compliance Certification

EU=U-00069

58 6NYCRR 201-6.5(f)(1): Compliance Certification

EU=U-00069,Proc=J11

59 6NYCRR 228.3(a): Recordkeeping, Reports of VOCs - EU Level

60 6NYCRR 228.4: Compliance Certification

61 6NYCRR 228.5(c): Compliance Certification



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

- 62 6NYCRR 228.5(d): Department access to obtain samples.
- 63 6NYCRR 228.6(a): Prohibition of sale.
- 64 6NYCRR 228.6(b): Compliance Certification
- 65 6NYCRR 228.7: Compliance Certification
- 66 6NYCRR 228.10: Compliance Certification

EU=U-00069,EP=01210

- 67 6NYCRR 212.4(c): Compliance Certification
- 68 6NYCRR 212.6(a): Compliance Certification

EU=U-00069,EP=035P4

- 69 6NYCRR 212.4(c): Compliance Certification
- 70 6NYCRR 212.6(a): Compliance Certification
- 71 6NYCRR 212.10(c)(4)(iii): Compliance Certification

EU=U-00069,EP=035P5

- 72 6NYCRR 212.4(c): Compliance Certification

EU=U-00069,EP=08120

- 73 6NYCRR 212.4(c): Compliance Certification
- 74 6NYCRR 212.6(a): Compliance Certification

EU=U-00069,EP=117A0

- 75 6NYCRR 212.6(a): Compliance Certification

EU=U-00069,EP=117A0,Proc=J01,ES=117AB

- 76 6NYCRR 212.4(c): Compliance Certification

EU=U-00069,EP=117A0,Proc=J01,ES=117AE

- 77 6NYCRR 212.4(c): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 78 ECL 19-0301: Reporting Requirements for State-Only Enforceable Conditions

- 79 ECL 19-0301: Contaminant List

- 80 6NYCRR 201-1.4: Unavoidable noncompliance and violations

- 81 6NYCRR 211.2: Air pollution prohibited

- 82 6NYCRR 212.5(d): Less restrictive permissible emission rate possible if BACT applied

Emission Unit Level

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



EU=U-00016,EP=082X3

83 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

EU=U-00016,EP=082X4

84 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

EU=U-00040,EP=01413

85 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

86 6NYCRR 212.4(a): Compliance Demonstration

EU=U-00040,EP=01425

87 6NYCRR 212.4(a): Compliance Demonstration

EU=U-00040,EP=01425,Proc=J04

88 6NYCRR 212.4(a): Compliance Demonstration

EU=U-00040,EP=01426

89 6NYCRR 212.4(a): Compliance Demonstration

EU=U-00040,EP=01426,Proc=J08

90 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

EU=U-00040,EP=01427

91 6NYCRR 212.4(a): Compliance Demonstration

EU=U-00040,EP=01427,Proc=J08

92 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

EU=U-00069,EP=01207

93 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

EU=U-00069,EP=035P4

94 6NYCRR 212.4(a): Emissions from new emission sources and/or

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



modifications

95 6NYCRR 212.4(a): Compliance Demonstration

EU=U-00069,EP=035P5,Proc=J11,ES=035AU

96 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

EU=U-00069,EP=08119

97 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

EU=U-00069,EP=08120

98 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

EU=U-00069,EP=11706

99 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

EU=U-00069,EP=117A0

100 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

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

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

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

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

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

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

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

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

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

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



order to maintain compliance with the conditions of this permit.

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

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

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

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

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

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

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

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.

Condition 2: Fees

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 3.1:

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

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

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 6: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.

- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

- iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

6274 East Avon-Lima Road
Avon, NY 14414-9519

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Condition 8: Recordkeeping requirements
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:

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

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Condition 11: Recycling and Salvage
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:

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 the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 04/30/2007 and 04/29/2012

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

Item 13.1:

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 this Subpart. 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 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.

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 04/30/2007 and 04/29/2012

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

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. 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 this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

and Federal air pollution control requirements, regulations, or law.

Condition 15: Standard Requirement - Provide Information
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

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

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 04/30/2007 and 04/29/2012



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Applicable Federal Requirement: 6NYCRR 211.3

Item 20.1:

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

Condition 21: Accidental release provisions.

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 40CFR 68

Item 21.1:

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

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

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

Condition 22: Recycling and Emissions Reduction

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 22.1:

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

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Condition 23: False statement
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 200.3

Item 23.1:

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 24: Compliance Schedule for Unpermitted Sources
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 24.1:

1. The owner or operator of the facility shall notify the Department within 2 working days following the identification of an unpermitted source that is required to be included in the Title V permit.
2. Within 60 working days following the identification of an unpermitted source that is required to be included in the Title V permit,
 - i. The owner or operator shall provide notification to the Department in accordance with the Operational Flexibility Plan under 201-6.5(f) to incorporate any such emission sources and/or emission points that meet the Operational Flexibility Plan criteria; or
 - ii. The owner or operator shall submit a Title V permit modification application for unpermitted sources that do not meet the Operational Flexibility Plan criteria.

Condition 25: Emission Unit Definition
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 25.1:

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

Emission Unit: F-AC001

Emission Unit Description:

Facility Emission Unit for solvent metal parts cleaners and associated fugitive emissions.

Building(s): FACILITY

Item 25.2:

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

Emission Unit: U-00016

Emission Unit Description:

Dispersion manufacturing operations including size reduction and slurry manufacturing equipment, and

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



associated fugitive emissions.

Building(s): 082

Item 25.3:

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

Emission Unit: U-00040

Emission Unit Description:

Health Imaging intensifying screen web coating operations, including grid ionizers, solution delivery, and solvent cleaning operations associated with the manufacture of x-ray screens and other health imaging applications, and associated fugitive emissions.

Building(s): 014

Item 25.4:

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

Emission Unit: U-00069

Emission Unit Description:

Surface coating and general process emission sources associated with Health Imaging intensifying screen manufacturing, including equipment associated with mixing, material processing, precipitation, reduction operations, product finishing/assembly, and associated fugitive emissions.

Building(s): 012
035
081
117

Condition 26: Compliance Certification

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(f)

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Plan

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



I. Protocol Objective

The objective of this condition is to maximize operational flexibility at the facility by building into the Title V Permit the capability to make certain changes using a protocol. As provided under 6 NYCRR Part 201-6.5(f)(2), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.7.

II. Applicability

A. The following types of changes may be reviewed under this protocol, except as prohibited under II.B or III.A.c below:

1. New emission sources,
2. 6 NYCRR Part 200 "modifications",
3. Emission point relocations, and
4. Changes that otherwise could be handled under the minor permit modification process in 6 NYCRR Part 201-6.7.

B. This protocol does not apply to the following changes:

1. Any project defined as major in 6NYCRR 621.4(g);
2. Any significant permit modification as that term is defined in 6 NYCRR 201-6.7(d); or
3. Any change that would exceed the emissions allowable under the permit whether expressed as a rate or in terms of total emissions.

III. Protocol

A. Criteria

1. The permittee shall evaluate changes reviewed under this protocol in accordance with the following criteria:

- a. All underlying federal and state requirements with which the new or changed emission source must comply must exist in the Title V permit. The new or changed source will be associated with an existing emissions unit, process, emission source or emission point that has the necessary regulatory citations. Existing permit conditions may be amended to reference or include the new or changed

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



emission source and any related information, and/or, subject to DEC approval, new conditions proposed, to provide the appropriate monitoring parameters.

b. Any new or changed emission source shall not be part of a source project that results in a significant net emissions increase that exceeds the NSR thresholds identified in 6 NYCRR Part 231-2 or 40 CFR 52.21. The permittee will submit documentation of major NSR program non-applicability for NYSDEC review and approval consistent with the advance notification provisions of Section III.B. below.

c. The permittee shall not use the protocol to make physical changes or changes in the method of operation of existing emission sources that would require a new federally enforceable cap either to avoid major New Source Review requirements or to address and comply with other Clean Air Act requirements such as RACT. Such changes must be addressed via the significant permit modification provisions.

B. Notification Requirements for Changes Reviewed under Protocol

1. The permittee shall notify the Department in writing at least 30 calendar days in advance of making any changes reviewed under the protocol which meet the criteria of A.1. a-c, above. When the change is to a source subject to a federally applicable requirement, the EPA administrator shall be notified in a similar manner.

2. Notifications made in accordance with this protocol will include the following documentation:

a. Identification of the Title V permit emission unit, process(es), emission sources, and emission points affected by the proposed change with applicable revisions shown in a revised Emission Unit Matrix;

b. Description of the proposed change;

c. If appropriate, the identification and description of emissions control technology and compliance terms;

d. Documentation of the project's or emission source's compliance with respect to all state and/or federally applicable requirements according to an established procedure which includes the following steps:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



i. For new emission sources, identify all contaminants and calculate the emission rate potential and maximum projected actual annual emission rates after the proposed change. For changes to existing emission sources, emission rate potential and maximum projected actual annual emission rates shall be provided for all contaminants affected by the change.

ii. Indicate the environmental rating for each contaminant identified in III.B.1.d.i as previously established by the Department or proposed based on the current DAR-1 Ambient Guideline Concentration Table or toxicological review.

iii. Provide the rationale for determining that major NSR does not apply which may include: 1) an explanation that the change is not a source project or modification under 40 CFR 52.21, 2) calculations that demonstrate that the emissions increase from the project alone is not significant or, 3) calculations that demonstrate that the net emissions increase for the contemporaneous period is not significant.

iv. Provide the necessary information for a facility-wide ambient impact analysis, including the maximum projected actual annual emission rates consistent with the permit.

v. Identify and evaluate the applicability of all regulations likely to be triggered by the new or changed emission source, using the emissions information, environmental ratings, modeling results and knowledge of operations.

e. Any other relevant information used for the evaluation of the proposed project or emission source under the Protocol.

C. Review and Approval of Changes

1. The permittee will be permitted to proceed with the change 30 days from the Department's receipt of the notification and/or additional information upon prior Departmental approval, whichever is first, unless the Department determines that a more detailed review (in accordance with #3 below) or a permit modification (in accordance with #2 below) is required.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



2. The Department may require a permit modification, in order to impose new applicable requirements or additional permit conditions if it determines that changes proposed pursuant to notification do not meet the criteria under III.A or that the change may have a significant air quality impact or be otherwise potentially significant under SEQRA (6NYCRR Part 617).

3. The Department may require that the permittee not undertake the proposed change until the Department completes a more detailed review of the proposed change, which may include potential air quality impacts and/or applicable requirements. The Department's determination shall include a listing of information required for further review, if necessary.

4. The Department shall respond to the permittee in writing with a determination under #2 or 3 above within 15 days of receipt of the notification and/or additional information from the permittee.

D. Additional Compliance Obligations for Changes Made Under this Protocol

1. Upon commencement of the change, the permittee shall comply with all applicable requirements and permit conditions, including any amended or proposed in accordance with III.A.1.a above.

2. The permittee shall provide with the semi-annual monitoring report, a summary of the changes made in accordance with this protocol during the corresponding period and a statement of the compliance status of each.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 27: Submittal of Episode Action Plans
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable Federal Requirement: 6NYCRR 207

Item 27.1:

An episode action plan must be submitted for approval by the Department in accordance with the



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

requirements of 6NYCRR Part 207. The plan shall contain detailed steps which will be taken by the facility to reduce air contaminant emissions during each stage of an air pollution episode. Once approved, the facility shall take whatever actions are prescribed by the episode action plan when an air pollution episode is in effect.

Condition 28: Sources meeting Federal requirements, satisfy Part 212 compliance for regulated contaminant Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.5(e)

Item 28.1:

A process emission source, subject to the Federal new source performance standards in 40 CFR Part 60, the national emission standards for hazardous air pollutants in 40 CFR part 61, or to the polychlorinated biphenyl disposal criteria in 40 CFR Part 761 satisfies the requirements of this Part for the contaminant regulated by the Federal standard if the source owner can demonstrate that the source is in compliance with the respective Federal regulation.

Condition 29: Will remain subject Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.1(d)

Item 29.1:

Any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228 will remain subject to these provisions even if the annual potential to emit VOCs for the facility later falls below the thresholds set forth in 228.1(b).

Condition 30: Compliance Certification Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.1(e)(13)

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Low-use specialty coatings may be used in surface coating operations pursuant to the Part 228 exemption of 6 NYCRR Part 228.1(e)(13) if approved by the Department.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



6 NYCRR Part 228 does not apply to low-use surface coatings used for intermittent or specialty -type operations, where the combined facility-wide total usage is 55 gallons or less on a 12-month rolling basis. Records of low-use surface coatings used must be maintained on an as used basis in a format acceptable to the Department in accordance with the record keeping provisions of 6 NYCRR Part 228.5.

The permittee may use the Operational Flexibility provisions included in this permit to request approval of an exempt low-use specialty coating.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

**Condition 31: National Emission Standard for Asbestos
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable Federal Requirement: 40CFR 61, NESHAP Subpart M

Item 31.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 61, Subpart M.

**Condition 32: Paper and Other Web Coating MACT Compliance Schedule
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable Federal Requirement: 40CFR 63, Subpart JJJJ

Item 32.1:

The existing surface coating operation, Emission Source 014AD, is applicable to 40 CFR 63 Subpart JJJJ Paper & Other Web Coating MACT rule. While under previous ownership, the source was compliant with the HAP content averaging provisions of 63.3370(c)(4). Beginning with the date of operation under new ownership, the facility shall comply with the requirements of Subpart JJJJ in accordance with the following schedule:

1. Within 6 months, the facility shall submit a plan for Department approval which includes a proposed compliance option under 40 CFR 63 Subpart JJJJ and a proposal for the selection and design of control equipment, if appropriate.
2. Within 12 months, the facility shall begin construction of the control equipment.



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

3. Within 18 months, the facility shall complete construction and begin operation ("debug") of the control equipment.

4. Within 180 days of beginning operation of a control device, the facility shall conduct a performance test, consistent with the requirements of 40 CFR 63. 3360 and 40 CFR 63.7.

The above schedule shall be met unless the permittee has obtained a formal non-applicability determination from USEPA or there is any other change in State or Federal law or policy which would render the construction of control equipment no longer required to achieve compliance with 40 CFR 63 Subpart JJJ.

In order to minimize emissions for the interim period prior to beginning operation of the new control device, facility-wide emissions of HAPs shall be limited as follows:

Emissions of any single HAP shall be less than 10 tons per year (tpy) and emissions of combined HAPs shall be less than 25 tpy as determined on a rolling 12 month basis. To demonstrate compliance with these limitations, emissions of individual HAPs and total HAPs from the facility shall be calculated on a monthly basis and incorporated into a rolling twelve-month total, expressed in tpy. Emission calculations shall be based on material usage and production records, and/or engineering calculations. The records shall be retained on site for five years and made available to the Department upon request.

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

**Condition 33: Emission Point Definition By Emission Unit
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable Federal Requirement: 6NYCRR 201-6

Item 33.1:

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

Emission Unit: U-00016

Emission Point: 082X3

Height (ft.): 110

Diameter (in.): 12

Building: 082

Emission Point: 082X4

Height (ft.): 110

Diameter (in.): 12

Building: 082

Item 33.2:

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

Emission Unit: U-00040



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Emission Point: 01413 Height (ft.): 38	Diameter (in.): 16	Building: 014
Emission Point: 01425 Height (ft.): 20	Diameter (in.): 15	Building: 014
Emission Point: 01426 Height (ft.): 31	Diameter (in.): 38	Building: 014
Emission Point: 01427 Height (ft.): 26	Diameter (in.): 2	Building: 014

Item 33.3:

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

Emission Unit: U-00069		
Emission Point: 01207 Height (ft.): 99	Diameter (in.): 16	Building: 012
Emission Point: 01210 Height (ft.): 1	Length (in.): 56	Width (in.): 26 Building: 012
Emission Point: 035P4 Height (ft.): 44	Diameter (in.): 18	Building: 035
Emission Point: 035P5 Height (ft.): 44	Diameter (in.): 15	Building: 035
Emission Point: 08119 Height (ft.): 119	Diameter (in.): 19	Building: 081
Emission Point: 08120 Height (ft.): 119	Diameter (in.): 17	Building: 081
Emission Point: 11706		



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Height (ft.): 30

Length (in.): 14

Width (in.): 12

Building: 117

Emission Point: 117A0

Height (ft.): 36

Diameter (in.): 10

Building: 117

**Condition 34: Process Definition By Emission Unit
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable Federal Requirement: 6NYCRR 201-6

Item 34.1:

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

Emission Unit: F-AC001

Process: 226

Source Classification Code: 4-01-003-36

Process Description:

Solvent Metal Cleaning Machines located in Bldgs 6, 12, 14, 35, 42, 59, 65, 69, 81, 82, 117 & 214 which are used for manufacture of Health Imaging products. These machines with 6 NYCRR Part 226 applicability would otherwise be exempt or trivial consistent with Part 201-3.

Emission Source/Control: F0226 - Process

Item 34.2:

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

Emission Unit: U-00016

Process: S11

Source Classification Code: 3-16-040-03

Process Description:

General size reduction, small scale polymer manufacturing, small scale chemical manufacturing and dispersion operations including sources <3.0 lb/hr VOC ERP (Particle Milling)

Emission Source/Control: 082AX - Process

Emission Source/Control: 082AY - Process

Item 34.3:

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

Emission Unit: U-00040

Process: J02

Source Classification Code: 3-16-050-01



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Process Description:

Plastic/Paper Web Coating process with compliant coatings
or an approved coating system.

Emission Source/Control: 014AD - Process

Item 34.4:

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

Emission Unit: U-00040

Process: J03

Source Classification Code: 3-16-050-02

Process Description:

General process emission sources with NOx emissions less
than 3 lb/hr ERP (i.e. ionization).

Emission Source/Control: 014AA - Process

Item 34.5:

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

Emission Unit: U-00040

Process: J04

Source Classification Code: 3-16-120-02

Process Description:

Nonhalogenated solvent cleaning operations not regulated
by 40 CFR 63 Subpart T or 6 NYCRR Part 226.

Emission Source/Control: 014AC - Process

Emission Source/Control: 014AE - Process

Emission Source/Control: 014AF - Process

Emission Source/Control: 014AK - Process

Emission Source/Control: 014AL - Process

Emission Source/Control: 014AM - Process

Emission Source/Control: 014AN - Process

Emission Source/Control: 014AP - Process

Emission Source/Control: 014AQ - Process

Item 34.6:

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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Emission Unit: U-00040

Process: J05

Source Classification Code: 3-16-120-02

Process Description:

Halogenated solvent cleaning operations subject to 40 CFR
63 Subpart T and 6 NYCRR Part 226

Emission Source/Control: 014AE - Process

Emission Source/Control: 014AF - Process

Emission Source/Control: 014AK - Process

Emission Source/Control: 014AL - Process

Emission Source/Control: 014AM - Process

Emission Source/Control: 014AN - Process

Emission Source/Control: 014AP - Process

Emission Source/Control: 014AQ - Process

Item 34.7:

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

Emission Unit: U-00040

Process: J06

Source Classification Code: 3-16-050-01

Process Description: R&D Web Surface Coating Process

Emission Source/Control: 014AD - Process

Item 34.8:

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

Emission Unit: U-00040

Process: J08

Source Classification Code: 3-16-050-02

Process Description:

General process emission sources with VOC emission less
than 3 lb/hr ERP (i.e. solution storage, handling,
preparation & evaporation).

Emission Source/Control: 014AG - Process

Emission Source/Control: 014AH - Process

Emission Source/Control: 014AJ - Process

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Item 34.9:

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

Emission Unit: U-00040

Process: J09

Source Classification Code: 3-16-120-02

Process Description:

Solvent Metal Cleaning operations subject to 6 NYCRR Part
226

Emission Source/Control: 014AE - Process

Emission Source/Control: 014AF - Process

Emission Source/Control: 014AK - Process

Emission Source/Control: 014AL - Process

Emission Source/Control: 014AM - Process

Emission Source/Control: 014AN - Process

Emission Source/Control: 014AP - Process

Emission Source/Control: 014AQ - Process

Item 34.10:

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

Emission Unit: U-00069

Process: J01

Source Classification Code: 3-16-160-03

Process Description:

Image enhancing screen manufacturing processes, including
mixing, material processing, precipitation, and reduction
operations.

Emission Source/Control: 03505 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 11703 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 035AK - Process

Emission Source/Control: 117AB - Process

Emission Source/Control: 117AE - Process

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Item 34.11:

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

Emission Unit: U-00069

Process: J07

Source Classification Code: 3-16-160-03

Process Description:

General process emission sources (i.e. cleaning, sealing, printing, and product finishing/assembly).

Emission Source/Control: 01201 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 01202 - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 012AA - Process

Emission Source/Control: 012AD - Process

Emission Source/Control: 117AA - Process

Item 34.12:

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

Emission Unit: U-00069

Process: J10

Source Classification Code: 3-16-050-01

Process Description: Preparation of coating solutions

Emission Source/Control: 081AR - Process

Item 34.13:

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

Emission Unit: U-00069

Process: J11

Source Classification Code: 3-16-050-01

Process Description:

Paper/Plastic surface coating using Part 228 compliant coatings not subject to P&OW MACT

Emission Source/Control: 035AU - Process

Emission Source/Control: 081AS - Process

Item 34.14:

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

Emission Unit: U-00069



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Process: J12

Source Classification Code: 3-16-050-01

Process Description:

Paper/Plastic surface coating for purposes of research and development

Emission Source/Control: 035AU - Process

Emission Source/Control: 081AS - Process

Condition 35: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 226

Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: F-AC001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for Conveyorized Degreasers

A. Equipment Specifications

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

(1) One of the following:

(i) a refrigerated chiller; or

(ii) local exhaust ventilation and a carbon adsorption unit, or an equivalent system, for collection of VOCs.

(2) A drying tunnel, rotating basket or other device acceptable to the Department which prevents carry-out of VOCs.

(3) Safety switches which shut off the system when the degreaser malfunctions.

(4) Minimize openings at the entrance and exit of the degreaser.

B. Operating Requirements:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



(1) Exhaust ventilation rate shall not exceed 125 percent of the minimum ventilation rate required for the protection of workers in the vicinity of the degreaser.

(2) Minimize carry-out emissions by:
(i) proper racking for best drainage; and
(ii) maintaining a conveyor speed at less than 11 ft/min.

(3) Water must not be visibly detectable in the solvent leaving the water separator.

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;

or

(c) no solvent is in the 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.

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Condition 36: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 226

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: F-AC001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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 when the internal volume of the unit is greater than 2 gallons:

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if practical. When cleaning a part that isn't practical to drain under cover, the part shall be drained in a way which minimizes emissions of VOC.
- (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) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C.

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



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. In addition, the log must note whether the cold cleaner is equipped with an internal drain as specified in item A(2) above.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

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

Condition 37: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 37.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00016 Emission Point: 082X3
Process: S11 Emission Source: 082AX

Item 37.2:

Compliance Certification 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 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.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



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 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 38: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00016 Emission Point: 082X3
Process: S11 Emission Source: 082AX

Item 38.2:

Compliance Certification 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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

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 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 39: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00016 Emission Point: 082X4
Process: S11 Emission Source: 082AY

Item 39.2:

Compliance Certification 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: 8-2614-00823/00001

Facility DEC ID: 8261400823

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 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 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Condition 40: Compliance Certification

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00016 Emission Point: 082X4
Process: S11 Emission Source: 082AY

Item 40.2:

Compliance Certification 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.

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,



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

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 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(1)

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission Unit U-00040 includes emission sources which are permitted under more than one operating scenario. These operating scenarios are defined by Processes and J02, J04, J05, J06 and J09. These processes share some of the same equipment, but operate the shared equipment in different ways or in a manner that triggers different applicable requirements.

Contemporaneously with making a change from one operating scenario to another, Kodak shall record the scenarios in a log in the operating area or retain appropriate time stamped operating records that indicate which scenario is in operation. Records shall be kept on site for five years and made available to the department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Condition 42: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.3(d)

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Process: J02

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A coating system has been authorized under Process J02 for production of 1) x-ray phosphor medical screens regulated by FDA, 2) non-medical phosphor screens used in research & industrial applications; and 3) specific non-phosphor coatings of which the only product is alanine dosimeters (1 layer & no VOCS).

An owner or operator of a coating line which utilizes a coating system as a control strategy (which may also employ a control device) must comply with the following provisions:

(1) the coating system must be approved by the Department prior to the use of the coating system in the manufacture of a product for sale;

(2) coatings which are applied manually by handheld spray guns cannot be utilized in a coating system;

(3) the emission differential (ED) for a coating system must be determined using the formula in 6 NYCRR Part 228.3(d)(3). The ED for the coating system is the sum of the individual ED values calculated for every coating used in the coating system. The ED calculation requirement is to be performed each time the series of coatings in a coating system is changed. The coating system ED must be less than or equal to zero before the coating system may

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



be operated;

(4) the ED figures for the individual coating used in the coating system must be calculated on an instantaneous basis. There is no averaging period for individual coatings which are part of a coating system;

(5) the method or instrument by which the owner or operator will measure or calculate the volume of coating applied must be approved by the Department; and

(6) For each ED calculation performed, the owner or operator of the coating system must record the following and make records available to the Department upon request:

- (i) the name or identification of each coating;
- (ii) the coating parameters used to determine the ED value (Equation 7);
- (iii) the individual ED values for each coating; and
- (iv) the ED value calculated for the coating system.

(7) Any information or record showing noncompliance with these requirements must be reported the Department within 30 days following notice or generation of the information or record.

(8) Records shall be maintained at the facility for a period of five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 43: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.5(c)

Item 43.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Emission Unit: U-00040

Process: J02

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

When the sampling and analysis methods referenced in paragraphs (b), (e)(2) or (f) 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.

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 44: Department access to obtain samples.

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.5(d)

Item 44.1:

This Condition applies to Emission Unit: U-00040

Process: J02

Item 44.2:

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 45: Prohibition of sale.

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.6(a)

Item 45.1:

This Condition applies to Emission Unit: U-00040

Process: J02

Item 45.2:

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 6NYCRR Part 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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

maximum permitted VOC content limitations specified in tables 1 and 2 of sections 228.7 or 228.8 of 6NYCRR 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 6NYCRR 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 6NYCRR Part 228.

Condition 46: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.6(b)

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040
Process: J02

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any person selling a coating for use in a coating line subject to 6NYCRR Part 228 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 47: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.7

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040
Process: J02

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings used for the surface coating of paper and other web materials may contain a maximum of 2.9 pounds of volatile organic compounds (VOC) per gallon of coating (minus water and excluded VOC) as applied.

Continuing compliance shall be verified by maintaining records of formulation data as specified in 6 NYCRR Part 228.5(a). These records shall contain the following information:

1. Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating,
2. Purchase, usage, and/or production records of the coating material including solvents.
3. Any other parameters used to verify compliance.

These records shall be updated prior to running any formulation changes in production.

Upon request by the Department, the permittee shall perform Method 24 analyses or other approved sampling and analysis method (or supply samples to DEC for analysis) to verify the VOC content of coatings. When there is a discrepancy between the calculated formulation and the approved sampling and analysis results, the sampling/analysis results shall be used for compliance purposes.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: Method 24 (or other approved method)

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Condition 48: Compliance Certification

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.10

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Process: J02

Item 48.2:

Compliance Certification 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, 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;



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

- (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 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 49: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 226

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Process: J05

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for Cold Cleaning Degreasers

A. Equipment Specifications

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



The following types of control equipment must be used when conducting cold cleaning degreasing, solvent metal cleaning when the internal volume of the unit is greater than 2 gallons:

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if practical. When cleaning a part that isn't practical to drain under cover, the part shall be drained in a way which minimizes emissions of VOC.
- (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) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C.

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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

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. In addition, the log must note whether the cold cleaner is equipped with an internal drain as specified in item A(2) above.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 50: Part 63 General Provisions requirements
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable Federal Requirement: 40CFR 63.460(b), Subpart T

Item 50.1:

This Condition applies to Emission Unit: U-00040

Process: J05

Item 50.2:

Owners or operators of affected sources subject to 40CFR63 Subpart T must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Appendix B of Subpart T. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

**Condition 51: Batch Cold Cleaning Machine Standards
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable Federal Requirement: 40CFR 63.462(a)(2), Subpart T

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Item 51.1:

This Condition applies to Emission Unit: U-00040
Process: J05

Item 51.2:

Each owner/operator of an immersion batch cold cleaning machine shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and have a freeboard ratio of 0.75 or greater.

Condition 52: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 40CFR 63.462(c), Subpart T

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040
Process: J05

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a batch cold solvent cleaning machine complying with paragraph 40 CFR 63.642 (a)(2) or (b) shall comply with the work and operational practice requirements specified in paragraphs (1) through (9) listed below:

- (1) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (2) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
- (3) The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
- (4) The owner or operator shall ensure that the solvent



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

level does not exceed the fill line.

(5) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of paragraph (c)(1) of this section.

(6) When an air- or pump-agitated solvent bath is used, the owner or operator shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.

(7) The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.

(8) Except as provided in paragraph (c)(9) of this section, sponges, fabric, wood, and paper products shall not be cleaned.

(9) The prohibition in paragraph (c)(8) of this section does not apply to the cleaning of porous materials that are part of polychlorinated biphenyl (PCB) laden transformers if those transformers are handled throughout the cleaning process and disposed of in compliance with an approved PCB disposal permit issued in accordance with the Toxic Substances Control Act.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 53: Batch Cold Cleaning Machine Standards
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable Federal Requirement: 40CFR 63.462(d), Subpart T

Item 53.1:

This Condition applies to Emission Unit: U-00040

Process: J05

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Item 53.2:

Each owner or operator of a batch cold cleaning machine shall submit an initial notification report as described in 40 CFR 63.468(a) and (b) and a compliance report as described in 40 CFR 63.468(c).

Condition 54: Compliance Certification

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 226

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Process: J09

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 54.2:

Compliance Certification 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 when the internal volume of the unit is greater than 2 gallons:

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if practical. When cleaning a part that isn't practical to drain under cover, the part shall be drained in a way which minimizes emissions of VOC.
- (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) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C.

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. In addition, the log must note whether the cold cleaner is equipped with an internal drain as specified in item A(2) above.



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 55: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 01413
Process: J08 Emission Source: 014AJ

Item 55.2:

Compliance Certification 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 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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

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 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 56: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 01413
Process: J08 Emission Source: 014AJ

Item 56.2:

Compliance Certification 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.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



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 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 57: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.4

Item 57.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 01426
Process: J02

Item 57.2:



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere 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 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 58: Compliance Certification



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(1)

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069

Item 58.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission Unit U-00069 includes emission sources which are permitted under more than one operating scenario. These operating scenarios are defined by Processes J11 and J12. These processes share some of the same equipment, but operate the shared equipment in different ways or in a manner that triggers different applicable requirements.

Contemporaneously with making a change from one operating scenario to another, Kodak shall record the scenarios in a log in the operating area or retain appropriate time stamped operating records that indicate which scenario is in operation. Records shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 59: Recordkeeping, Reports of VOCs - EU Level

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.3(a)

Item 59.1:

This Condition applies to Emission Unit: U-00069

Process: J11

Item 59.2: Use of coatings that exceed the maximum permitted pounds of VOC per gallon, minus water and excluded VOC at application specified in table 1 of section 228.7 or table 2 of section 228.8 of 6



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

NYCRR Part 228 is prohibited.

Condition 60: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.4

Item 60.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069

Process: J11

Item 60.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere 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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

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 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 61: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.5(c)

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069
Process: J11

Item 61.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

When the sampling and analysis methods referenced in paragraphs (b), (e)(2) or (f) 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 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 62: Department access to obtain samples.
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.5(d)



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Item 62.1:

This Condition applies to Emission Unit: U-00069
Process: J11

Item 62.2:

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 63: Prohibition of sale.

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.6(a)

Item 63.1:

This Condition applies to Emission Unit: U-00069
Process: J11

Item 63.2:

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 6NYCRR Part 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 6NYCRR 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 6NYCRR 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 6NYCRR Part 228.

Condition 64: Compliance Certification

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.6(b)

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069
Process: J11

Item 64.2:

Compliance Certification shall include the following monitoring:



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any person selling a coating for use in a coating line subject to 6NYCRR Part 228 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 65: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.7

Item 65.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069

Process: J11

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 65.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings used for the surface coating of paper and other web materials may contain a maximum of 2.9 pounds of volatile organic compounds (VOC) per gallon of coating (minus water and excluded VOC) as applied.

Continuing compliance shall be verified by maintaining records of formulation data as specified in 6 NYCRR Part 228.5(a). These records shall contain the following information:

1. Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating.



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

2. Purchase, usage, and/or production records of the coating material including solvents.
3. Any other parameters used to verify compliance.

These records shall be updated prior to running any formulation changes in production.

Upon request by the Department, the permittee shall perform Method 24 analyses or other approved sampling and analysis method (or supply samples to DEC for analysis) to verify the VOC content of coatings. When there is a discrepancy between the calculated formulation and the approved sampling and analysis results, the sampling/analysis results shall be used for compliance purposes.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 2.9 pounds per gallon
Reference Test Method: Method 24 (or other approved method)
Monitoring Frequency: CONTINUOUS
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 66: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 228.10

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069
Process: J11

Item 66.2:

Compliance Certification 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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



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, 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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 67: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 67.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069 Emission Point: 01210

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 67.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard of Part 212.4(c), the primary set of panel filters (Control Device 01201) and the backup set of panel filters (Control Device 01202) will be inspected semi-annually and replaced as necessary.

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

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 68: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 68.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Emission Unit: U-00069 Emission Point: 01210

Item 68.2:

Compliance Certification 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.

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 30 days after the reporting period.



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

The initial report is due 7/30/2007.

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

Condition 69: Compliance Certification

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 69.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069 Emission Point: 035P4

Item 69.2:

Compliance Certification 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 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.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



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 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 70: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 70.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00069 Emission Point: 035P4

Item 70.2:
Compliance Certification 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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

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 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 71: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

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

Item 71.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069 Emission Point: 035P4

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

Item 71.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

In order to maintain compliance with Reasonably Available Control Technology (RACT) requirements, annual emissions of total VOCs are limited to 0.34 tons per year, on a rolling twelve-month basis. This limit is based on the RACT evaluation submitted in June 2002.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. These records shall be retained on site for five years and made available to the Department upon request. The RACT determination shall be re-evaluated and the report submitted prior to the renewal of the Title V permit.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 72: Compliance Certification

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 72.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069 Emission Point: 035P5

Item 72.2:

Compliance Certification 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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



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 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 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 73: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 73.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation
Permit ID: 8-2614-00823/00001 Facility DEC ID: 8261400823



Emission Unit: U-00069 Emission Point: 08120

Item 73.2:

Compliance Certification 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 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.



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 74: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 74.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069 Emission Point: 08120

Item 74.2:

Compliance Certification 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.

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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



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 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 75: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 75.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069 Emission Point: 117A0

Item 75.2:

Compliance Certification 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

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



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 30 days after the reporting period.

The initial report is due 7/30/2007.

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

Condition 76: Compliance Certification

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 76.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069 Emission Point: 117A0

Process: J01 Emission Source: 117AB

Item 76.2:

Compliance Certification 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



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

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 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 30 days after the reporting period.
The initial report is due 7/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 77: Compliance Certification
Effective between the dates of 04/30/2007 and 04/29/2012



Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 77.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069 Emission Point: 117A0
Process: J01 Emission Source: 117AE

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 77.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard of Part 212.4(c), emissions from the Jet-O-Mizer Production Grinding Equipment (ES 117AE) shall be controlled with baghouse filters (Control Device 11703). The pressure drop across the filters shall be monitored and maintained between 0.1-4.0 inches of water. The pressure gauges will be monitored daily when the Jet-O-Mizer grinding equipment is being operated. Maintenance, including any required filter changes, will be performed as necessary to maintain the proper pressure drop. Production records, records of daily gauge readings and baghouse maintenance shall be maintained on site and made available to the Department upon request.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: 0.1 inches of water
Upper Permit Limit: 4.0 inches of water
Monitoring Frequency: DAILY
Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2007.
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: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

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

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

STATE ONLY APPLICABLE REQUIREMENTS

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

Condition 78: Reporting Requirements for State-Only Enforceable Conditions
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable State Requirement: ECL 19-0301

Item 78.1:



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Notwithstanding the reporting requirements found at Condition #5 of this Permit , for those state only enforceable conditions with a reporting requirement of "Upon request by regulatory agency", the permittee is not obligated to include a statement regarding monitoring, record keeping, or deviations in the semi-annual report. Nothing contained in this paragraph shall impair or prejudice any rights the Department may have to seek information from the permittee regarding compliance with the State-Only enforceable conditions.

Condition 79: Contaminant List

Effective between the dates of 04/30/2007 and 04/29/2012

Applicable State Requirement: ECL 19-0301

Item 79.1:

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

CAS No: 000079-20-9

Name: ACETIC ACID, METHYL ESTER

CAS No: 000075-09-2

Name: DICHLOROMETHANE

CAS No: 000067-64-1

Name: DIMETHYL KETONE

CAS No: 000646-06-0

Name: DIOXACYCLOPENTANE, 1,3-(C3H6O2)

CAS No: 000141-78-6

Name: ETHYL ACETATE

CAS No: 000064-17-5

Name: ETHYL ALCOHOL (ETHANOL)

CAS No: 000067-56-1

Name: METHYL ALCOHOL

CAS No: 000078-93-3

Name: METHYL ETHYL KETONE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

Condition 80: Unavoidable noncompliance and violations

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Effective between the dates of 04/30/2007 and 04/29/2012

Applicable State Requirement: 6NYCRR 201-1.4

Item 80.1:

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 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 superceded 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.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Condition 81: Air pollution prohibited
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable State Requirement: 6NYCRR 211.2

Item 81.1:

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.

Condition 82: Less restrictive permissible emission rate possible if
BACT applied
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable State Requirement: 6NYCRR 212.5(d)

Item 82.1:

Where a source owner can demonstrate to the satisfaction of the commissioner that he will apply best available control technology, the commissioner may specify a less restrictive permissible emission rate, emission standard or degree of air cleaning for such source than required under this Part provided that the less restrictive requirement is equivalent to that which can be achieved through the application of best available control technology

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

Condition 83: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable State Requirement: 6NYCRR 212.4(a)

Item 83.1:

This Condition applies to Emission Unit: U-00016 Emission Point: 082X3

Item 83.2:

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 84: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable State Requirement: 6NYCRR 212.4(a)

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Item 84.1:

This Condition applies to Emission Unit: U-00016 Emission Point: 082X4

Item 84.2:

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 85: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 85.1:

This Condition applies to Emission Unit: U-00040 Emission Point: 01413

Item 85.2:

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 86: Compliance Demonstration
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 86.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040 Emission Point: 01413

Regulated Contaminant(s):

CAS No: 000067-64-1 DIMETHYL KETONE

CAS No: 000075-09-2 DICHLOROMETHANE

Item 86.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

According to the provisions of 6 NYCRR 212.5(d), less restrictive emission rates have been established for acetone and dichloromethane of 13.2 lb/hr and 7.2 lb/hr, respectively. In order to maintain compliance with Best Available Control Technology (BACT) requirements, annual emissions of dimethyl ketone (acetone) are limited to 256



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

lb/yr and annual emissions of dichloromethane are limited to 170 lb/yr, on a rolling twelve-month basis. These limits are based on the BACT evaluation submitted in June 2005.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. These records shall be retained on site for five years and made available to the Department upon request. The BACT determination shall be re-evaluated and the report submitted by June 10, 2010.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 87: Compliance Demonstration
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable State Requirement: 6NYCRR 212.4(a)

Item 87.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040 Emission Point: 01425

Regulated Contaminant(s):

CAS No: 000075-09-2 DICHLOROMETHANE

Item 87.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

According to the provisions of 6 NYCRR 212.5(d), a less restrictive emission rate has been established for dichloromethane of 6 lb/hr. In order to maintain compliance with Best Available Control Technology (BACT) requirements, annual emissions of dichloromethane are limited to 171 lb/yr, on a rolling twelve-month basis. These requirements are based on the BACT evaluation submitted in June 2005.

Emissions shall be calculated on a monthly basis using



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. These records shall be retained on site for five years and made available to the Department upon request. The BACT determination shall be re-evaluated and the report submitted by June 10, 2010.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 88: Compliance Demonstration
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable State Requirement: 6NYCRR 212.4(a)

Item 88.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040 Emission Point: 01425
Process: J04

Regulated Contaminant(s):
CAS No: 000067-64-1 DIMETHYL KETONE

Item 88.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

According to the provisions of 6 NYCRR 212.5(d), a less restrictive emission rate for dimethyl ketone (acetone) of 17.1 lb/hr has been established. In order to maintain compliance with Best Available Control Technology (BACT) requirements, annual emissions of acetone are limited to 2.55 ton per year on a rolling twelve-month basis. These limits are based on the BACT evaluation submitted in June 2005.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. These records shall be retained on site for five years and made



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

available to the Department upon request. The BACT determination shall be re-evaluated and the report submitted by June 10, 2010.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 89: Compliance Demonstration
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable State Requirement: 6NYCRR 212.4(a)

Item 89.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040 Emission Point: 01426

Regulated Contaminant(s):

CAS No: 000067-64-1 DIMETHYL KETONE

CAS No: 000079-20-9 ACETIC ACID, METHYL ESTER

CAS No: 000075-09-2 DICHLOROMETHANE

Item 89.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

According to the provisions of 6 NYCRR 212.5(d), less restrictive emission rates have been established for dimethyl ketone (acetone), methyl acetate, and dichloromethane of 99.0 lb/hr, 19.8 lb/hr, and 104.0 lb/hr, respectively. In order to maintain compliance with Best Available Control Technology (BACT) requirements, annual emissions of acetone and methyl acetate are limited to 16.2 tons per year and annual emissions of dichloromethane are limited to 16.6 tons per year, on a rolling twelve-month basis. These limits are based on the BACT evaluation submitted in June 2005.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. These records shall be retained on site for five years and made



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

available to the Department upon request. The BACT determination shall be re-evaluated and the report submitted by June 10, 2010.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 90: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 90.1:

This Condition applies to Emission Unit: U-00040 Emission Point: 01426
Process: J08

Item 90.2:

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 91: Compliance Demonstration
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 91.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040 Emission Point: 01427

Regulated Contaminant(s):

CAS No: 000067-64-1 DIMETHYL KETONE

Item 91.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

According to the provisions of 6 NYCRR 212.5(d), a less restrictive emission rate has been established for emissions of dimethyl ketone (acetone) of 10.5 lb/hr. In order to maintain compliance with Best Available Control Technology (BACT) requirements, annual emissions of acetone are limited to 500 lb/yr, on a rolling twelve-month basis. These limits are based on the BACT

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



evaluation submitted in June 2005.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. These records shall be retained on site for five years and made available to the Department upon request. The BACT determination shall be re-evaluated and the report submitted by June 10, 2010.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 92: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 92.1:

This Condition applies to Emission Unit: U-00040 Emission Point: 01427
Process: J08

Item 92.2:

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 93: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 93.1:

This Condition applies to Emission Unit: U-00069 Emission Point: 01207

Item 93.2:

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 94: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Item 94.1:

This Condition applies to Emission Unit: U-00069 Emission Point: 035P4

Item 94.2:

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 95: Compliance Demonstration
Effective between the dates of 04/30/2007 and 04/29/2012

Applicable State Requirement: 6NYCRR 212.4(a)

Item 95.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00069 Emission Point: 035P4

Regulated Contaminant(s):

CAS No: 000067-56-1	METHYL ALCOHOL
CAS No: 000067-64-1	DIMETHYL KETONE
CAS No: 000075-09-2	DICHLOROMETHANE
CAS No: 000078-93-3	METHYL ETHYL KETONE
CAS No: 000079-20-9	ACETIC ACID, METHYL ESTER
CAS No: 000141-78-6	ETHYL ACETATE
CAS No: 000646-06-0	DIOXACYCLOPENTANE, 1,3-(C3H6O2)
CAS No: 000064-17-5	ETHYL ALCOHOL (ETHANOL)

Item 95.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

According to the provisions of 6 NYCRR 212.5(d), less restrictive emission rates have been established for contaminants from this emission point as listed below:

ethyl alcohol (ethanol): 11.9 lb/hr
methyl alcohol (methanol): 11.9 lb/hr
dimethyl ketone (acetone): 11.9 lb/hr
methyl ethyl ketone: 11.9 lb/hr
acetic acid, methyl ester (methyl acetate): 11.9 lb/hr
dichloromethane (methylene chloride): 36.1 lb/hr
ethyl acetate: 11.9 lb/hr
1,3-dioxolane: 11.9 lb/hr

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



In order to maintain compliance with Best Available Control Technology (BACT) requirements, the total annual emissions of ethanol, methanol, acetone, methyl ethyl ketone, ethyl acetate, 1,3-dioxolane and methyl acetate is limited to 0.45 tons per year on a rolling twelve month basis. Annual emissions of dichloromethane are limited to 311 lbs per year on a rolling twelve-month basis. These limits are based on the BACT evaluation submitted in June 2002.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. These records shall be retained on site for five years and made available to the Department upon request. The BACT determination shall be re-evaluated and the report submitted prior to the renewal of the Title V permit.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 96: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 96.1:

This Condition applies to Emission Unit: U-00069 Emission Point: 035P5
Process: J11 Emission Source: 035AU

Item 96.2:

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 97: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 97.1:

This Condition applies to Emission Unit: U-00069 Emission Point: 08119



New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Item 97.2:

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 98: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 98.1:

This Condition applies to Emission Unit: U-00069 Emission Point: 08120

Item 98.2:

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 99: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 99.1:

This Condition applies to Emission Unit: U-00069 Emission Point: 11706

Item 99.2:

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 100: Emissions from new emission sources and/or modifications
Effective between the dates of 04/30/2007 and 04/29/2012**

Applicable State Requirement: 6NYCRR 212.4(a)

Item 100.1:

This Condition applies to Emission Unit: U-00069 Emission Point: 117A0

Item 100.2:

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.