



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 8-2614-00823/00001  
Mod 0 Effective Date: 04/30/2007 Expiration Date: 04/29/2012

Mod 1 Effective Date: Expiration Date:

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

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

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

Contact: SHARON M RUCINSKI  
CARESTREAM HEALTH INC  
1049 W RIDGE RD  
ROCHESTER, NY 14615  
(585) 722-6932

Description:

Mod 1 of the initial Title V Facility Permit issued April 30, 2007 for the Carestream Health Inc - Health Imaging Facility, consisting of former Eastman Kodak health imaging manufacturing and research operations in Buildings 214, 6, 12, 14, 28, 31, 42, 81, 82 and 117 in Kodak Park. The Facility remains subject to Title V regulations due to VOC emissions greater than 50 tons per year.

Modifications include installation of a regenerative thermal oxidizer (RTO) and scrubber system to mitigate emissions resulting from proposed production increases at the Bldg 14 health imaging intensifying screen coating process (Emission Source 014AD). The new control equipment, to be located in Building 31 of Kodak Park, will provide 95% control of HAP emissions to satisfy requirements of 40 CFR Part 63 Subpart JJJJ (Paper and Other Web Coating MACT rule), and replace the initial Permit's restrictions on uncontrolled HAP emissions.

Mod 1 also maintains a VOC RACT Variance for phosphor dispersion process sources relocated from Bldg 35 to Bldg 14 (Emission Point 01413). The VOC limit will remain 0.34 tons per year based on Carestream's RACT evaluation showing the cost of control equipment for these sources, in the new location, to continue to exceed the Department's cost guideline level, currently \$4285 per ton of VOC emissions controlled.



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:            DAVID L BIMBER  
   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 compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



## LIST OF CONDITIONS

### DEC GENERAL CONDITIONS

#### General Provisions

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

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;
- 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 W RIDGE RD  
ROCHESTER, NY 14615

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

Permit Effective Date:

Permit Expiration Date:



## 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

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 25 6NYCRR 201-6: Emission Unit Definition
- 1-1 40CFR 63.Tbl 2, Subpart JJJJ: Subpart A Requirements for Subpart JJJJ

#### 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

- 35 6NYCRR 226: Compliance Certification
- 36 6NYCRR 226: Compliance Certification

#### EU=U-00040

- 1-2 6NYCRR 201-6.5(f)(1): Compliance Certification
- 41 6NYCRR 201-6.5(f)(1): Compliance Certification

#### EU=U-00040,Proc=J05

- 49 6NYCRR 226: Compliance Certification

#### EU=U-00040,EP=01413

- 1-3 6NYCRR 212.4(c): Compliance Certification
- 1-4 6NYCRR 212.6(a): Compliance Certification
- 1-5 6NYCRR 212.10(c)(4)(iii): 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=03101

- 1-6 6NYCRR 228.4: Compliance Certification

#### EU=U-00040,EP=03101,Proc=J02,ES=014AD

- 1-7 40CFR 63.3320(b)(4), Subpart JJJJ: Compliance Certification
- 1-8 40CFR 63.3321(a), Subpart JJJJ: Compliance Certification



- 1-9 40CFR 63.3330(a), Subpart JJJJ: Compliance date for existing affected sources.
- 1-10 40CFR 63.3350(e), Subpart JJJJ: Compliance Certification
- 1-11 40CFR 63.3350(f), Subpart JJJJ: Compliance Certification
- 1-12 40CFR 63.3360(e)(1), Subpart JJJJ: Compliance Certification
- 1-13 40CFR 63.3360(e)(2), Subpart JJJJ: Recording of process information during performance test.
- 1-14 40CFR 63.3360(f), Subpart JJJJ: Compliance Certification
- 1-15 40CFR 63.3370(e), Subpart JJJJ: Compliance Certification
- 1-16 40CFR 63.3370(k)(1), Subpart JJJJ: Compliance Certification
- 1-17 40CFR 63.3370(k)(2)(i), Subpart JJJJ: Compliance Certification
- 1-18 40CFR 63.3370(k)(3)(i), Subpart JJJJ: Compliance Certification
- 1-19 40CFR 63.3400(c), Subpart JJJJ: Compliance Certification
- 1-20 40CFR 63.3400(d), Subpart JJJJ: Compliance Certification
- 1-21 40CFR 63.3400(e), Subpart JJJJ: Compliance Certification
- 1-22 40CFR 63.3400(f), Subpart JJJJ: Compliance Certification
- 1-23 40CFR 63.3400(g), Subpart JJJJ: Compliance Certification
- 1-24 40CFR 63.3410, Subpart JJJJ: Compliance Certification

**EU=U-00069**

- 1-25 6NYCRR 201-6.5(f)(1): Compliance Certification
- 58 6NYCRR 201-6.5(f)(1): 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

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 79 ECL 19-0301: Contaminant List

**Emission Unit Level**

**EU=U-00040,EP=01413**

- 1-26 6NYCRR 212.4(a): Compliance Demonstration
- 86 6NYCRR 212.4(a): Compliance Demonstration

**EU=U-00040,EP=01425,Proc=J05**

- 1-27 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

**EU=U-00040,EP=01426**

- 1-28 6NYCRR 212.4(a): Compliance Demonstration
- 89 6NYCRR 212.4(a): Compliance Demonstration

**EU=U-00040,EP=01426,Proc=J02,ES=014AU**



1-29 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

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

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

**EU=U-00040,EP=01428**

1-30 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 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=21401**

1-31 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 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 - 6 NYCRR 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 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 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 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.

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

**Condition 25: Emission Unit Definition**

**Effective between the dates of 04/30/2007 and Permit Expiration Date**

**Applicable Federal Requirement:6NYCRR 201-6**

**Item 25.1(From Mod 1):**

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 surface treatment, 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): 012  
014  
031

**Item 25.2(From Mod 1):**

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  
081  
117  
214

**Item 25.3(From Mod 0):**



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

Emission Unit: F-AC001 End Date: 04/11/2008

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

Building(s): FACILITY

**Item 25.4(From Mod 0):**

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 associated fugitive emissions.

Building(s): 082

**Condition 1-1: Subpart A Requirements for Subpart JJJJ  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.Tbl 2, Subpart JJJJ**

**Item 1-1.1:**

The applicant must comply with the requirements of 40 CFR 63 Subpart A, as specified in Table 2 of 40 CFR 63 Subpart JJJJ.

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

**Condition 33: Emission Point Definition By Emission Unit  
Effective between the dates of 04/30/2007 and Permit Expiration Date**

**Applicable Federal Requirement:6NYCRR 201-6**

**Item 33.1(From Mod 1):**

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

Emission Unit: U-00040

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
Emission Point: 01428		
Height (ft.): 33	Diameter (in.): 5	Building: 014
Emission Point: 03101		
Height (ft.): 45	Diameter (in.): 36	
NYTMN (km.): 4785.	NYTME (km.): 286.	Building: 031

**Item 33.2(From Mod 1):**

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

Emission Unit: U-00069		
Emission Point: 01210		
Height (ft.): 1	Length (in.): 56	Width (in.): 26
		Building: 012
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		
Height (ft.): 30	Length (in.): 14	Width (in.): 12
		Building: 117
Emission Point: 117A0		
Height (ft.): 36	Diameter (in.): 10	Building: 117
Emission Point: 21401		
Height (ft.): 34	Diameter (in.): 13	Building: 214

**Item 33.3(From Mod 0):**

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 33.4(From Mod 0):**

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

Emission Unit: U-00069

Emission Point: 01207 Removal Date: 04/11/2008  
Height (ft.): 99 Diameter (in.): 16  
NYTMN (km.): 4786. NYTME (km.): 284. Building: 012

Emission Point: 035P4 Removal Date: 04/11/2008  
Height (ft.): 44 Diameter (in.): 18  
NYTMN (km.): 4786. NYTME (km.): 284. Building: 035

Emission Point: 035P5 Removal Date: 05/01/2007  
Height (ft.): 44 Diameter (in.): 15  
NYTMN (km.): 4786. NYTME (km.): 284. Building: 035

**Condition 34: Process Definition By Emission Unit  
Effective between the dates of 04/30/2007 and Permit Expiration Date**

**Applicable Federal Requirement:6NYCRR 201-6**

**Item 34.1(From Mod 1):**

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

Process Description:

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

Emission Source/Control: 031AA - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: 031AB - Control  
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 014AD - Process

Emission Source/Control: 014AU - Process

**Item 34.2(From Mod 1):**

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: 01401 - Control  
Control Type: FABRIC FILTER





Emission Source/Control: 014AN - Process

Emission Source/Control: 014AP - Process

Emission Source/Control: 014AQ - Process

**Item 34.5(From Mod 1):**

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: 031AA - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 031AB - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 014AD - Process

**Item 34.6(From Mod 1):**

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: 031AA - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 031AB - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 014AG - Process

Emission Source/Control: 014AT - Process

**Item 34.7(From Mod 1):**

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

Emission Source/Control: 12226 - Process

**Item 34.8(From Mod 1):**

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

Emission Unit: U-00040

Process: J13

Source Classification Code: 3-16-160-03

Process Description:

General process emission sources with VOC emissions greater than 3 lb/hr ERP (i.e. solution storage, handling, preparation and evaporation) transferred from Building 35 (EP 035P4).

Emission Source/Control: 01401 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 01402 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 014AH - Process

Emission Source/Control: 014AJ - Process

**Item 34.9(From Mod 1):**

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: 11703 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 117AB - Process

Emission Source/Control: 117AE - Process



**Item 34.10(From Mod 1):**

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: 214AB - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 214AC - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 012AD - Process

Emission Source/Control: 117AA - Process

Emission Source/Control: 214AA - Process

**Item 34.11(From Mod 1):**

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 34.12(From Mod 1):**

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: 081AS - Process

**Item 34.13(From Mod 1):**

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

Emission Unit: U-00069

Process: J12

Source Classification Code: 3-16-050-01

Process Description:



Paper/Plastic surface coating for purposes of research and development

Emission Source/Control: 081AS - Process

**Item 34.14(From Mod 0):**

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 End Date: 4/11/2008

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 34.15(From Mod 0):**

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

**Condition 35: Compliance Certification**

**Effective between the dates of 04/30/2007 and Permit Expiration Date**

**Applicable Federal Requirement:6NYCRR 226**

**Expired by Mod 1**

**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:

- (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).

**Condition 36: Compliance Certification**  
**Effective between the dates of 04/30/2007 and Permit Expiration Date**

**Applicable Federal Requirement:6NYCRR 226**

**Expired by Mod 1**

**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 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.

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

**Condition 1-2: Compliance Certification**  
**Effective for entire length of Permit**

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

**Replaces Condition(s) 41**

**Item 1-2.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

**Item 1-2.2:**

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, Carestream 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.

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

**Condition 41: Compliance Certification**  
**Effective between the dates of 04/30/2007 and Permit Expiration Date**

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

**Replaced by Condition(s) 1-2**

**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).

**Condition 49: Compliance Certification**

**Effective between the dates of 04/30/2007 and Permit Expiration Date**

**Applicable Federal Requirement:6NYCRR 226**

**Expired by Mod 1**

**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



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.

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 1-3: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Replaces Condition(s) 55**

**Item 1-3.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 01413

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-3.2:**

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/sdcf particulate standard of Part 212.4(c), the primary set of panel filters (Control Device 01410) and the backup set of HEPA filters (Control Device 01402) will be inspected semi-annually and replaced if 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.

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



**Condition 1-4: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Replaces Condition(s) 56**

**Item 1-4.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 01413

**Item 1-4.2:**

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

**Condition 1-5: Compliance Certification**  
**Effective for entire length of Permit**

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

**Replaces Condition(s) 71**

**Item 1-5.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040                      Emission Point: 01413

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

**Item 1-5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with Reasonably Available Control Technology (RACT) requirements for the Pressurized Vessels and Weigh Scale (ES 014AJ) and Solution Delivery (ES 014AH), annual emissions of total VOCs from this emission point are limited to 0.34 tons per year, on a rolling twelve-month basis. This limit is based on the RACT evaluation for Emission Point 035P4 (prior location of RACT applicable sources) submitted in June 2002. A revised RACT evaluation for these sources in their new Bldg 14 location is currently in progress.

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. This RACT determination shall be re-evaluated and the report submitted within five years of issuance of this permit.

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

**Condition 55: Compliance Certification**  
**Effective between the dates of 04/30/2007 and Permit Expiration Date**



**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Replaced by Condition(s) 1-3**

**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 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 Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Replaced by Condition(s) 1-4**

**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.

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 1-6: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6NYCRR 228.4**

**Item 1-6.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101

**Item 1-6.2:**

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 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: QUARTERLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-7: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.3320(b)(4), Subpart JJJJ**

**Item 1-7.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040                      Emission Point: 03101  
Process: J02                                      Emission Source: 014AD

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

**Item 1-7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility uses an oxidizer to control organic HAP emissions, the facility shall operate the oxidizer such that an outlet concentration of organic HAP of no greater than 20 ppmv by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent on and after the compliance date as set forth in §63.3330. Compliance shall be demonstrated using the provisions listed in §63.3370.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.



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

**Condition 1-8: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.3321(a), Subpart JJJJ**

**Item 1-8.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
Process: J02

Emission Point: 03101  
Emission Source: 014AD

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

**Item 1-8.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For any web coating line or group of web coating lines for which the facility uses add-on control devices, unless a solvent recovery system and liquid-liquid material balance is used, the facility must meet the operating limits listed in Table 1 or according to the alternative operating limits listed in §63.3321(b). These operating limits apply to emission capture systems and control devices, and the facility must establish the operating limits during the performance test according to the requirements in §63.3360(e)(3). The facility must meet the operating limits at all times after the limits are established.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-9: Compliance date for existing affected sources.**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.3330(a), Subpart JJJJ**

**Item 1-9.1:**

This Condition applies to Emission Unit: U-00040 Emission Point: 03101  
Process: J02 Emission Source: 014AD

**Item 1-9.2:**

An existing affected source subject to the provisions of this subpart, must comply by December 5, 2005. Facility must complete any performance test required in § 63.3360 within the time limits specified in § 63.7(a)(2).



**Condition 1-10: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.3350(e), Subpart JJJJ**

**Item 1-10.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
Process: J02

Emission Point: 03101  
Emission Source: 014AD

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

**Item 1-10.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(1) Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. There must be a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.

(2) There must be valid data from at least 90 percent of the hours during which the process operated.

(3) Facility must determine the hourly average of all recorded readings according to paragraphs (3)(i) and (ii) below.

(i) To calculate a valid hourly value, there must be at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.

(ii) Provided all of the readings recorded in accordance with paragraph (3) clearly demonstrate continuous compliance with the standard that applies to the facility, then the facility is not required to determine the hourly average of all recorded readings.

(4) Facility must determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, there must be at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).

(5) Facility must record the results of each inspection, calibration, and validation check of the CPMS.

(6) At all times, facility must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(7) Except for monitoring malfunctions, associated repairs, or required quality assurance or control



activities (including calibration checks or required zero and span adjustments), facility must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in § 63.3370. Facility must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(8) Any averaging period for which there is no valid monitoring data and such data are required constitutes a deviation, and the facility must notify the Administrator in accordance with § 63.3400(c).

(9) For a facility using a non-catalytic oxidizer to comply with the emission limits in §63.3320, the facility must install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart records, data logger, or temperature indicator must be replaced. The facility must replace the equipment whether the facility chooses not to perform the calibration or the equipment cannot be calibrated properly.

The facility must install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of +/-1% of the temperature being monitored in degrees Celsius, or +/-1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.

The continuous temperature monitoring system must meet the requirements in §63.3350(e)(1)-(8).

This condition shall be updated with detailed parameter limits (i.e. minimum operating temperature) once compliance testing is complete.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-11: Compliance Certification**



**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.3350(f), Subpart JJJJ**

**Item 1-11.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101

Process: J02

Emission Source: 014AD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 1-11.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility is complying with the emission limits in §63.3320 through the use of a capture system and control device for one or more coating lines, the facility must develop a site-specific monitoring plan containing the following information for these capture systems:

- 1) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained.
- 2) The monitoring plan must explain why this parameter is appropriate for demonstrating ongoing compliance.
- 3) The monitoring plan must identify the specific monitoring procedures
- 4) The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in §63.3320. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

The facility must monitor the capture system in accordance with the site-specific monitoring plan. Any deviation from the operating parameter value or range of values will be considered a deviation from the emission limit. The facility must review and update the capture system monitoring plan at least annually and make the plan available for inspection by the NYSDEC upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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



**Condition 1-12: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.3360(e)(1), Subpart JJJJ**

**Item 1-12.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
Process: J02

Emission Point: 03101  
Emission Source: 014AD

**Item 1-12.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

An initial performance test to establish the destruction or removal efficiency of the control device must be conducted such that control device inlet and outlet testing is conducted simultaneously, and the data are reduced in accordance with the test methods and procedures in paragraphs (i) through (ix) below. Facility must conduct three test runs as specified in § 63.7(e)(3), and each test run must last at least 1 hour.

(i) Method 1 or 1A of 40 CFR part 60, appendix A, must be used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR part 60, appendix A, must be used to determine gas volumetric flow rate.

(iii) Method 3, 3A, or 3B of 40 CFR part 60, appendix A, must be used for gas analysis to determine dry molecular weight. Facility may also use as an alternative to Method 3B the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas in ANSI/ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses [Part 10, Instruments and Apparatus]," (incorporated by reference, see § 63.14).

(iv) Method 4 of 40 CFR part 60, appendix A, must be used to determine stack gas moisture.

(v) The gas volumetric flow rate, dry molecular weight, and stack gas moisture must be determined during each test run specified in paragraph (vii) below.

(vi) Method 25 or 25A of 40 CFR part 60, appendix A, must be used to determine total gaseous non-methane organic matter concentration. Use the same test method for both the inlet and outlet measurements which must be conducted simultaneously. Facility must submit notice of the intended test method to the Administrator for approval along with notification of the performance test required under § 63.7(b). Facility must use Method 25A if any of the conditions described in paragraphs (A) through (D) below, apply to the control device.



- (A) The control device is not an oxidizer.
  - (B) The control device is an oxidizer but an exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the emission standards in § 63.3320; or
  - (C) The control device is an oxidizer but the volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or
  - (D) The control device is an oxidizer but because of the high efficiency of the control device the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.
- (vii) Except as provided in § 63.7(e)(3), each performance test must consist of three separate runs with each run conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic compound concentrations and mass flow rates, the average of the results of all the runs will apply.
- (viii) Volatile organic matter mass flow rates must be determined for each run specified in paragraph (vii) above, using Equation 1 of this section:

$$Mf = QsdCc[12][0.0416][10^{-6}] \quad \text{Eq. 1}$$

Where:

- Mf = Total organic volatile matter mass flow rate, kilograms (kg)/hour (h).
- Qsd = Volumetric flow rate of gases entering or exiting the control device, as determined according to § 63.3360(e)(1)(ii), dry standard cubic meters (dscm)/h.
- Cc = Concentration of organic compounds as carbon, ppmv.
- 12.0 = Molecular weight of carbon.
- 0.0416 = Conversion factor for molar volume, kg-moles per cubic meter (mol/m<sup>3</sup>) (@ 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

(ix) For each run, emission control device destruction or removal efficiency must be determined using Equation 2 of this section:

$$E = \frac{Mfi - Mfo}{Mfi} \times 100 \quad \text{Eq. 2}$$



Where:

E = Organic volatile matter control efficiency of the control device, percent.

Mfi = Organic volatile matter mass flow rate at the inlet to the control device, kg/h.

Mfo = Organic volatile matter mass flow rate at the outlet of the control device, kg/h.

(x) The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the test runs and calculated in Equation 2 of this section.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 95 percent reduction

Reference Test Method: SEE DESCRIPTION

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-13: Recording of process information during performance test.  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.3360(e)(2), Subpart JJJJ**

**Item 1-13.1:**

This Condition applies to Emission Unit: U-00040 Emission Point: 03101  
Process: J02 Emission Source: 014AD

**Item 1-13.2:**

Facility must record such process information as may be necessary to determine the conditions in existence at the time of the performance test. Operations during periods of startup, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test.

**Condition 1-14: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.3360(f), Subpart JJJJ**

**Item 1-14.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
Process: J02

Emission Point: 03101  
Emission Source: 014AD

Regulated Contaminant(s):



CAS No: 0NY100-00-0 HAP

**Item 1-14.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility is demonstrating compliance by meeting the requirements in § 63.3370(e), (f), (g), (h), (i)(2), (k), (n)(2), or (3), or (p), the facility must determine capture efficiency using the following procedures:

- 1) The facility may assume the capture efficiency equals 100% if the capture system is a permanent total enclosure (PTE). The facility must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40CFR51, appendix M, and that all exhaust gases from the enclosure are delivered to a control device.
- 2) The facility may determine capture efficiency according to the protocols for testing with temporary total enclosures that are specified in Methods 204 and 204A-F of 40CFR51, appendix M. The facility may exclude never-controlled work stations from such capture efficiency determinations.
- 3) The facility may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in appendix A of subpart KK of Part 63. The facility may exclude never-controlled work stations from such capture efficiency determinations.

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-15: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.3370(e), Subpart JJJJ**

**Item 1-15.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101

Process: J02

Emission Source: 014AD

Regulated Contaminant(s):



CAS No: 0NY100-00-0 HAP

**Item 1-15.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95% for each month, or operate a capture system and oxidizer so that an outlet organic HAP concentration of no greater than 20 ppmv by compound on a dry basis is achieved as long as the capture efficiency is 100% as detailed in §63.3320(b)(4).

The facility must demonstrate compliance in accordance with §63.3370(i) when emissions from the affected source are controlled by a solvent recovery device.

The facility must demonstrate compliance in accordance with §63.3370(j) when emissions from the affected source are controlled by a control device with a continuous parameter monitoring system (CPMS).

The facility must demonstrate compliance in accordance with §63.3370(k) when emissions from the affected source are controlled by an oxidizer.

If the affected source has only always-controlled work stations and operates more than one capture system or more than one control device, the facility must demonstrate compliance in accordance with the provisions of §63.3370(n) or (p).

If the affected source operates one or more never-controlled work stations or one or more intermittently-controlled work stations, the facility must demonstrate compliance in accordance with the provisions in §63.3370(n).

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-16: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.3370(k)(1), Subpart JJJJ**

**Item 1-16.1:**



The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
Process: J02

Emission Point: 03101  
Emission Source: 014AD

**Item 1-16.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Facility must demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters as specified in paragraphs (i) through (iii) below:

(i) Determine the oxidizer destruction efficiency using the procedure in § 63.3360(e).

(ii) Determine the capture system capture efficiency in accordance with § 63.3360(f).

(iii) Capture and control efficiency monitoring.

Whenever a web coating line is operated, continuously monitor the operating parameters established in accordance with § 63.3350(e) and (f) to ensure capture and control efficiency.

Parameter Monitored: HAP

Lower Permit Limit: 95 percent reduction

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-17: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.3370(k)(2)(i), Subpart JJJJ**

**Item 1-17.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
Process: J02

Emission Point: 03101  
Emission Source: 014AD

**Item 1-17.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Calculate the overall organic HAP control efficiency



achieved using the following equation:

$$R = \frac{(E)(CE)}{100}$$

Where:

R = Overall organic HAP control efficiency, percent.

E = Organic volatile matter control efficiency of the control device, percent.

CE = Organic volatile matter capture efficiency of the capture system, percent.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-18: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.3370(k)(3)(i), Subpart JJJJ**

**Item 1-18.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101

Process: J02

Emission Source: 014AD

**Item 1-18.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is in compliance with the emission standards in § 63.3320(b) if the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with § 63.3360(e) for each 3-hour period, and the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with § 63.3350(f); and

(i) The overall organic HAP control efficiency is 95 percent or greater at an existing affected source.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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

**Condition 1-19: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.3400(c), Subpart JJJJ**

**Item 1-19.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
Process: J02

Emission Point: 03101  
Emission Source: 014AD

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

**Item 1-19.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a semiannual compliance report according to the following schedule:

The first compliance report must cover the period beginning on the compliance date that is specified for the affected source in §63.3330 and ending on June 30 or December 31, whichever date is the first date following the end of the calendar half immediately following the compliance date. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the calendar half immediately following the compliance date.

Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual period from July 1 to December 31. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

The semiannual compliance report shall contain the following information:

- company name and address
- statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report
- date of report and beginning and ending dates of the reporting period
- if there were no deviations from any emission limitations (emission limit or operating limit) that apply



to the facility, a statement that there were no deviations from the emission limitations during the reporting period, and that no continuous monitoring system was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

- for each deviation from an emission limitation (emission limit or operating limit) that applied to the facility and that occurs at an affected source where the facility is not using a continuous emission monitoring system to comply with the emission limitations, the compliance report must contain the total operating time of each affected source during the reporting period, information on the number, duration, and cause of deviations (including known causes), if applicable, and the corrective action taken, information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

- for each deviation from an emission limit occurring at an affected source where a CEMS is used, the information in §63.3370(c)(2)(vi)(A)-(J) shall be submitted.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-20: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.3400(d), Subpart JJJJ**

**Item 1-20.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101

Process: J02

Emission Source: 014AD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 1-20.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a Notification of Performance Tests as specified in §63.7 and §63.9(e) if the facility is required to conduct a performance test according to Subpart JJJJ. This notification and the site-specific test plan required under §63.7(c)(2) must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the



performance test are maintained. Unless EPA objects to the parameter or requests changes, the facility may consider the parameters approved.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-21: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.3400(e), Subpart JJJJ**

**Item 1-21.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040                      Emission Point: 03101  
Process: J02                                      Emission Source: 014AD

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

**Item 1-21.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a Notification of Compliance Status report as required in §63.9(h),

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-22: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.3400(f), Subpart JJJJ**

**Item 1-22.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040                      Emission Point: 03101  
Process: J02                                      Emission Source: 014AD

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

**Item 1-22.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit performance test reports as specified in §63.10(d)(2) if the facility is using a control device to comply with the emission standard and the facility has not obtained a waiver from the



performance test requirement or the facility is not exempted from this requirement by §63.3360(b). The performance test reports must be submitted as part of the notification of compliance status required in §63.3400(e).

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-23: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.3400(g), Subpart JJJJ**

**Item 1-23.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
Process: J02

Emission Point: 03101  
Emission Source: 014AD

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

**Item 1-23.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit startup, shutdown, and malfunction reports as specified in §63.10(d)(5), except that the provisions in subpart A of this part pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.

(1) If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by §63.6(e)(3), the owner or operator must state such information in the report. The startup, shutdown, or malfunction report must consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy and must be submitted to the Administrator.

(2) Separate startup, shutdown, and malfunction reports are not required if the information is included in the report specified in paragraph (c)(2)(vi) of this section.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



**Condition 1-24: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.3410, Subpart JJJJ**

**Item 1-24.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
Process: J02

Emission Point: 03101  
Emission Source: 014AD

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

**Item 1-24.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of an affected source must maintain the following records on a monthly basis for at least five years after each occurrence that requires recordkeeping. The latest two years must be kept on site and readily available, and the remaining 3 years may be kept off-site or on computer or other means as specified in §63.10(b)(1):

- The records specified in §63.10(b)(2) of all measurements needed to demonstrate compliance with Subpart JJJJ, including continuous emission monitor data in accordance with §63.3350(d)
- control device and capture system operating parameter data in accordance with §63.3350(c),(e), and (f)
- organic HAP content data for the purpose of demonstrating compliance in accordance with §63.3360(c)
- volatile matter and coating solids content data for the purpose of demonstrating compliance with §63.3360(d)
- overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with §63.3360(e) and (f)
- material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with §63.3370(b), (c), and (d)
- records specified in §63.10(c) for each continuous monitoring system operated by the owner/operator in accordance with §63.3350(b)
- records of all liquid-liquid material balances performed in accordance with §63.3370.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-25: Compliance Certification**  
**Effective for entire length of Permit**

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

**Replaces Condition(s) 58**

**Item 1-25.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00069

**Item 1-25.2:**

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

**Condition 58: Compliance Certification**  
**Effective between the dates of 04/30/2007 and Permit Expiration Date**

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

**Replaced by Condition(s) 1-25**

**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 69: Compliance Certification**

**Effective between the dates of 04/30/2007 and Permit Expiration Date**

**Applicable Federal Requirement:6NYCRR 212.4(c)**

**Expired by Mod 1**

**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.

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 Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Expired by Mod 1**

**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 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 Permit Expiration Date**

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

**Replaced by Condition(s) 1-5**

**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:

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 Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Expired by Mod 1**

**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 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).



**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 79: Contaminant List  
Effective between the dates of 04/30/2007 and Permit Expiration Date**

**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-

CAS No: 000079-00-5

Name: ETHANE, 1,1,2-TRICHLORO

CAS No: 000141-78-6

Name: ETHYL ACETATE

CAS No: 000064-17-5

Name: ETHYL ALCOHOL (ETHANOL)

CAS No: 0NY100-00-0

Name: HAP

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

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

**Condition 1-26: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable State Requirement: 6NYCRR 212.4(a)**

**Replaces Condition(s) 86, 95**

**Item 1-26.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040

Emission Point: 01413

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-
CAS No: 000064-17-5	ETHYL ALCOHOL (ETHANOL)

**Item 1-26.2:**

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): 10.0 lb/hr  
methyl alcohol (methanol): 10.0 lb/hr  
dimethyl ketone (acetone): 13.2 lb/hr  
methyl ethyl ketone: 10.0 lb/hr  
acetic acid, methyl ester (methyl acetate): 10.0 lb/hr  
dichloromethane (methylene chloride): 7.2 lb/hr  
ethyl acetate: 10 lb/hr  
1,3-dioxolane: 10 lb/hr

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 170 lbs per year on a rolling twelve-month basis. These limits are based on a conservative combination of BACT evaluations for EP 035P4 (EU U-00069), submitted in June 2002, and EP 01413 (EU U-00040), submitted in June 2005. A revised BACT evaluation for the new combination of EP 01413 sources is currently in progress.

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 within five years of issuance of this permit.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 86: Compliance Demonstration**

**Effective between the dates of 04/30/2007 and Permit Expiration Date**



**Applicable State Requirement:6NYCRR 212.4(a)**

**Replaced by Condition(s) 1-26**

**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 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 1-27: Emissions from new emission sources and/or modifications  
Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 1-27.1:**

This Condition applies to Emission Unit: U-00040 Emission Point: 01425  
Process: J05

**Item 1-27.2:**

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 1-28: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable State Requirement: 6 NYCRR 212.4(a)**

**Replaces Condition(s) 89**

**Item 1-28.1:**

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: 000079-00-5

ETHANE, 1,1,2-TRICHLORO

CAS No: 000079-20-9

ACETIC ACID, METHYL ESTER

CAS No: 000075-09-2

DICHLOROMETHANE

**Item 1-28.2:**

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, 1,1,2-trichloroethane, and dichloromethane of 99.0 lb/hr, 19.8 lb/hr, 2 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 and 1,1,2-trichloroethane 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 and the Notification of Change letter, dated August 3, 2007.

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.

These emissions from the Surface Coating Operations will be ducted through a new control system (EP 03101) which is being constructed for the purpose of complying with Subpart JJJJ MACT requirements. Once the new controls are operational, Part 212.4(a) BACT requirements will be



superceded by the MACT requirements and these limits will no longer apply.

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 Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Replaced by Condition(s) 1-28**

**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 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 1-29: Emissions from new emission sources and/or modifications  
Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 1-29.1:**

This Condition applies to Emission Unit: U-00040 Emission Point: 01426  
Process: J02 Emission Source: 014AU

**Item 1-29.2:**

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 90: Emissions from new emission sources and/or modifications  
Effective between the dates of 04/30/2007 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Expired by Mod 1**

**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 1-30: Emissions from new emission sources and/or modifications  
Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 1-30.1:**

This Condition applies to Emission Unit: U-00040 Emission Point: 01428

**Item 1-30.2:**

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 Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Replaced by Condition(s) 1-31**

**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 Permit Expiration Date**

**Applicable State Requirement: 6 NYCRR 212.4(a)**

**Expired by Mod 1**

**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 Permit Expiration Date**

**Applicable State Requirement: 6 NYCRR 212.4(a)**

**Replaced by Condition(s) 1-26**

**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-
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

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 Permit Expiration Date**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Expired by Mod 1**

**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 1-31: Emissions from new emission sources and/or modifications  
Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Replaces Condition(s) 93**



**Item 1-31.1:**

This Condition applies to Emission Unit: U-00069 Emission Point: 21401

**Item 1-31.2:**

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.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

