

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 6-3022-00014/00031 Renewal Number: 1

01/06/2006

Facility Identification Data

Name: TYCO HEALTHCARE KENDALL
Address: 130 SOUTH MAIN ST
ORISKANY FALLS, NY 13425

Owner/Firm

Name: TYCO HEALTHCARE GROUP LP
Address: 15 HAMPSHIRE STREET
MANSFIELD, MA 02048, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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Permit Description

Introduction

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

Summary Description of Proposed Project

Application for renewal of Air Title V Facility.

Attainment Status

TYCO HEALTHCARE KENDALL is located in the town of AUGUSTA in the county of ONEIDA. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

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

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

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

Facility Description

THIS FACILITY MANUFACTURES HOSPITAL PRODUCTS, MEDICAL DEVICES, SYRINGES AND WOUND CARE PRODUCTS FOR USE IN THE MEDICAL INDUSTRY.

Permit Structure and Description of Operations

The Title V permit for TYCO HEALTHCARE KENDALL is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

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

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

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TYCO HEALTHCARE KENDALL is defined by the following emission unit(s):
Emission unit U00001 - Cleaver Brooks Boiler - 25 MMBTU/hr Package Boiler.
Emission unit U00001 is associated with the following emission points (EP):
00001

It is further defined by the following process(es):
Process: 001 is located at Building 5 - No. 6 fuel oil combustion

Emission unit U00002 - Expandover Fabric Coating Operations
Emission unit U00002 is associated with the following emission points (EP):
00002, 00019, 00024

It is further defined by the following process(es):
Process: 002 is located at Building 1 - Adhesive Coating Operations including Empty Drum Venting. Emissions are controlled by a Catalytic Oxidizer. Note: It is the intention of Tyco to change the airstream through the catalytic oxidizer from a "push" system to a "pull (vacuum)" system. It is believed that the stack emission parameters may change and will be evidenced in the new stack test.
Process: 003 is located at Building 1 - Empty Drum Venting when Adhesive Coating line is not running. Ventilation system discharges evaporative VOCs from Empty Drums directly to ambient air.
Process: 004 is located at Building 1 - Expandover Coating Operations. Acrylic and Vinyl Coating Operations.

Emission unit U00004 - Shunt tube coating process and ancillary work stations.
Emission unit U00004 is associated with the following emission points (EP):
00010

It is further defined by the following process(es):
Process: 006 is located at Building 5 - Coating and assembly operations associated with Shunt tubes.

Emission unit U00006 - Enteral Access Bonding, Printing, and Coating Operations
Emission unit U00006 is associated with the following emission points (EP):
00020

It is further defined by the following process(es):
Process: 008 is located at Building 5 - Enteral Access device assembly and coating operations.

Emission unit U00007 - Aqua-Flo and Inerpan Production and Curagel/Curafil mixing operations.
Emission unit U00007 is associated with the following emission points (EP):
00021, 00022, 00023

It is further defined by the following process(es):
Process: 009 is located at Building 2 - Process emissions sources associated with Aqua-Flo and Inerpan Production and Curagel/Curafil mixing.

Emission unit U00008 - THIS UNIT CONSISTS OF EQUIPMENT USED TO MANUFACTURE CURAFOAM WOUND DRESSINGS.

Emission unit U00008 is associated with the following emission points (EP):
00025, 00026

It is further defined by the following process(es):
Process: 010 is located at Building 2 - PROCESS EMISSIONS ASSOCIATED WITH THE CURAFOAM PROCESS AND ITS CORONA TREATMENT SYSTEM.

Emission unit U00010 - PROCESS EMISSIONS ASSOCIATED WITH HYDROCOLLOID AND THIN FILM ANTI-MICROBIAL DRESSING (AMD) MANUFACTURE AND PLASMATREAT3 EQUIPMENT.

Emission unit U00010 is associated with the following emission points (EP):
00027, 00028

It is further defined by the following process(es):

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Process: 012 is located at Building 5 - THIS PROCESS INVOLVES THE PRODUCTION OF HYDROCOLLOID AND THIN FILM ANTI-MICROBIAL WOUND DRESSINGS FOR MEDICAL APPLICATIONS. BOTH PROCESSES WILL EMIT TRACE PARTICULATE INTO THE ROOM AND TRACE VOC INTO A GENERAL VENTILATION SYSTEM. THIS MODIFICATION WILL ALSO INCLUDE THE ADDITION OF A PLASMATREAT3 UNIT IN ORDER TO ENHANCE THE "THIN FILM" WEB SUBSTRATE'S RECEPTIVENESS TO VARIOUS COATING APPLICATIONS BY MODERATING ITS STATIC ELECTRICITY CHARGE. EMISSIONS FROM THE PLASMATREAT3 UNIT CONSIST OF WATER VAPOR, C O2, AND CO IN TRACE QUANTITIES. MINIMAL, IF ANY, OZONE WILL BE EMITTED AND WILL BE CONTROLLED BY THE OZONE DESTRUCTION PROCESS WITHIN THE PLASMATREAT3 UNIT.

Title V/Major Source Status

TYCO HEALTHCARE KENDALL is subject to Title V requirements. This determination is based on the following information:

This facility maintains Major Source Status because it was initially subject to an affected NESHAP (1992 or later) and therefore is subject indefinitely (once in, always in). Therefore, Tyco is unable to cap out of Title V.

Program Applicability

The following chart summarizes the applicability of TYCO HEALTHCARE KENDALL with regards to the principal air pollution regulatory programs:

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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to

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major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

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

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

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

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

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

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

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

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

Compliance Status

Facility is in compliance with all requirements

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SIC Codes

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

SIC Code	Description
2299	TEXTILE GOODS, NEC
3841	SURGICAL & MEDICAL INSTRUMENTS
3842	SURGICAL APPLIANCES & SUPPLIES

SCC Codes

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

SCC Code	Description
3-01-060-11	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PHARMACEUTICAL PREPARATIONS Coating Process
1-01-007-01	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - PROCESS GAS Boilers > 100 MBTU/HR
1-02-004-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL Grade 6 Oil
3-03-015-83	PRIMARY METAL PRODUCTION PRIM METAL PROD-INTEGRATED IRON & STEEL MFG (SEE 3-03-008 & 3-03-009)
3-07-011-99	MISC. COMBUSTION SOURCES: SOAKING PITS PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PAPER COATING AND GLAZING Extrusion Coating Line w/ Solvent Free Resin/Wax
5-02-005-07	SOLID WASTE DISPOSAL - COMMERCIAL/INSTITUTIONAL SOLID WASTE DISPOSAL: COMMERCIAL - INCINERATION: SPECIAL PURPOSE INCINERATION: SPECIAL PURPOSE (VOC CONTAMINATED SOIL)
4-02-007-01	SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Adhesive Application

Facility Emissions Summary

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

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operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
000108-94-1	CYCLOHEXANONE		> 0 but < 2.5 tpy
0NY100-00-0	HAP	49000	
0NY210-00-0	OXIDES OF NITROGEN		>= 25 tpy but < 40 tpy
010028-15-6	OZONE		> 0 but < 2.5 tpy
0NY075-00-0	PARTICULATES		>= 40 tpy but < 50 tpy
0NY075-00-5	PM-10		>= 40 tpy but < 50 tpy
007446-09-5	SULFUR DIOXIDE		>= 100 tpy but < 250 tpy
0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)		>= 40 tpy but < 50 tpy
0NY998-00-0	VOC	99800	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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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 - 6NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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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

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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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	91
U-00002/-/002	40CFR 60-A.11	General provisions - compliance with standards and maintenance requirements	72
U-00002/-/002	40CFR 60-A.12	General provisions - Circumvention	73
U-00002/-/002	40CFR 60-A.13	General provisions - Monitoring requirements	74
U-00002/-/002	40CFR 60-A.14	General provisions - Modification	75
U-00002/-/002	40CFR 60-A.15	General provisions - Reconstruction	76
FACILITY	40CFR 60-A.4	General provisions - Address	52
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U-00002/-/002	40CFR 60-A.9	General provisions - Availability of information	71
U-00002	40CFR 60-RR.440 (b)	Pressure Sensitive Tape and Label Surface Coating Operations	66
U-00002/-/002/S0002	40CFR 60-RR.445 (d)	Pressure Sensitive Tape and Label Surface Coating Operations - monitoring of operations and recordkeeping	81
U-00002/-/002/S0002	40CFR 60-RR.445 (h)	Pressure Sensitive Tape and Label Surface Coating Operations - monitoring of operations and recordkeeping	82
FACILITY	40CFR 63-A.10	Recordkeeping and Reporting	56, 57
FACILITY	40CFR 63-A.4	Prohibited Activities and Circumvention	53
U-00008	40CFR 63-A.6 (b) (2)	Compliance dates for new and reconstructed sources	83
FACILITY	40CFR 63-A.6 (e) (1) (i)	Operation and Maintenance (MACT Gen. Prov.)	54
FACILITY	40CFR 63-A.9	Notification Requirements	55
U-00008	40CFR 63-III.1293	Slabstock polyurethane foam production standards	84
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U-00008	40CFR 63-III.1306 (e)	Reporting Requirements-Semiannual Reports	86
U-00008	40CFR 63-III.1306 (f)	Reporting Requirements-Other reports	87
U-00008	40CFR 63-III.1307 (b)	Recordkeeping Requirements - Equipment Leak Records	88
U-00008	40CFR 63-III.1307 (e)	Recordkeeping Requirements - HAP Content	89
FACILITY	40CFR 63-JJJJ	Paper & Other Web Coating MACT	29
FACILITY	40CFR 63-0000	Printing, Coating, and Dyeing of Fabrics	29
FACILITY	40CFR 68	Chemical accident prevention provisions	21
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	22
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	10
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	92
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11

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FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	12
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Applicability Discussion:

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

ECL 19-301.

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

6NYCRR Part 200-.6

Acceptable ambient air quality - prohibits contravention of ambient air quality

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standards without mitigating measures

6NYCRR Part 200-.7

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

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)

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

6NYCRR Part 201-6

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

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authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR Part 201-6.5(c)

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

6NYCRR Part 201-6.5(c)(2)

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

6NYCRR Part 201-6.5(c)(3)(ii)

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

6NYCRR Part 201-6.5(e)

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

6NYCRR Part 201-6.5(g)

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

6NYCRR Part 202-1.1

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

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

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6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

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

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, TYCO HEALTHCARE KENDALL has been determined to be subject to the following regulations:

40CFR 60-A.11

This regulation specifies the type of opacity monitoring requirements in relation to compliance with the standards and maintenance requirements.

40CFR 60-A.12

This regulation prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

40CFR 60-A.13

This regulation specifies how monitoring shall be performed and which methods and appendices are used to determine if the monitoring is adequate and in compliance with the regulated standards.

40CFR 60-A.14

This regulation defines the term modification and what is and is not considered to be a modification,

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for the purpose of rule applicability.

40CFR 60-A.15

This regulation defines the term reconstruction and what is and is not considered to be a reconstruction project, for the purpose of rule applicability.

40CFR 60-A.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40CFR 60-A.7 (a) (4)

The facility must notify EPA and DEC of any physical or operational change to its existing operations which may increase the emission rate of any air pollutant to which an NSPS applies.

40CFR 60-A.7 (b)

This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40CFR 60-A.7 (d)

This condition specifies the required information and format for a summary report form and details when either a summary form and/or excess emissions reports are required.

40CFR 60-A.7 (f)

This condition specifies requirements for maintenance of files of all measurements, including continuous monitoring system (CMS), monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices for at least two years.

40CFR 60-A.9

This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

40CFR 60-RR.440 (b)

This requirement indicates that if operations are less than 45 Mg of VOC, VOC emission limits do not apply. If equal to or greater than 45 Mg of VOC or greater, VOC emission limits do apply.

40CFR 60-RR.445 (d)

The owner or operator of an affected facility operating at the conditions specified in 60.440(b) shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

40CFR 60-RR.445 (h)

Records of measurements must be retained for at least two years.

40CFR 63-A.10

Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot" items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.

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40CFR 63-A.4

Section 63.4 outlines generally prohibited activities such as operating in noncompliance with applicable standards and circumventing the rules. It requires sources to comply with Part 63 requirements regardless of whether those requirements have been included in a title V (NYCRR Part 201-6) permit for the source. Intentional or unintentional concealment of an emission that would otherwise violate a standard is itself a violation.

40CFR 63-A.6 (b) (2)

This condition requires new sources constructed or reconstructed after the effective date of a MACT standard to comply upon startup.

40CFR 63-A.6 (e) (1) (i)

Paragraph 63.6(e) requires that affected sources including air pollution control equipment must be operated and maintained to minimize emissions "at least to the level required by all relevant standards." It further requires that this be done at all time including during periods of startup, shutdown, and malfunction (SSM). Also operation during those times must be according to a SSM plan. §63.6(f) indicates however that nonopacity emission standards do not apply during SSM periods. Thus at those times the owner or operator must minimize emissions.

40CFR 63-A.9

Section 63.9 contains default notification requirements and deadlines for initial notifications (existing source: 120 days from promulgation; new source: dependent on size and timing), requests for extension of compliance (dependent on type of extension), notification that a source is subject to special compliance requirements (no later than initial notification), performance test notification (60 days before test), continuous monitoring related notifications (60 days before performance evaluation), and notifications of compliance status (also referred to as initial compliance reports; 60 days after completion of relevant compliance demonstration activity).

40CFR 63-III.1293

Section 63.1293 of the federal Flexible Polyurethane Foam (FPF) Maximum Achievable Control Technology regulation (Subpart III) contains the hazardous air pollutant (HAP) emission standards for slabstock FPF production. In effect it tells which other parts of the rule the facility must comply with among sections 63.1294 through 63.1299 for diisocyanate emissions and HAP auxiliary blowing agent emissions.

40CFR 63-III.1294

Section 63.1294 of the federal Flexible Polyurethane Foam (FPF) Maximum Achievable Control Technology regulation (Subpart III) contains the diisocyanate emission standards for slabstock FPF production. It details requirements for diisocyanate storage vessels, transfer pumps, and other components

40CFR 63-III.1306

Section 63.1306 of the federal Flexible Polyurethane Foam (FPF) Maximum Achievable Control Technology regulation (Subpart III) contains the reporting requirements for all FPF production. It specifies what requirements are different from the General Provisions in 40CFR63 Subpart A. A key difference is that the FPF rule requires a precompliance report no later than 12 months before the compliance date for slabstock production sources

40CFR 63-III.1306 (e)

Paragraph 63.1306(e) requires slabstock sources to submit semiannual reports and specifies the information to be submitted. Molded foam and rebond foam sources are not required to submit semiannual reports.

40CFR 63-III.1306 (f)

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Paragraph 63.1306(f) requires slabstock sources to send notifications 180 days prior to changes in selected emissions limitations (emission point specific vs. source-wide) and selected compliance methods (rolling annual vs. monthly). This does not apply to molded or rebond foam sources.

40CFR 63-III.1307 (b)

Section 63.1307 of the federal Flexible Polyurethane Foam (FPF) Maximum Achievable Control Technology regulation (Subpart III) contains the recordkeeping requirements for all FPF production. It specifies the differences from the General Provisions in 40CFR63 Subpart A and the information required to be recorded. Paragraphs (a) through (f) apply to slabstock sources. Paragraphs (g) and (h) apply to molded and rebond foam sources. Paragraph (b) covers the records for equipment leak detection and repair.

40CFR 63-III.1307 (e)

Section 63.1307 of the federal Flexible Polyurethane Foam (FPF) Maximum Achievable Control Technology regulation (Subpart III) contains the recordkeeping requirements for all FPF production. It specifies the differences from the General Provisions in 40CFR63 Subpart A and the information required to be recorded. Paragraphs (a) through (f) apply to slabstock sources. Paragraphs (g) and (h) apply to molded and rebond foam sources. Paragraph (e) requires product data sheets listing HAP content for each equipment cleaner used.

40CFR 63-JJJJ

This subpart contains standards for facilities that coat paper webs and other webs.

40CFR 63-OOOO

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for fabric and other textiles printing, coating and dyeing operations. The facility has accepted a cap on HAP emissions to avoid having to comply with the requirements of this subpart.

6NYCRR 201-3.1 (a)

An owner and/or operator of any of the exempt or trivial activities listed in this Subpart is exempt from the requirement to obtain registration or state facility permit. This does not apply to local air pollution control agency requirements.

6NYCRR 201-6.5 (f)

This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

6NYCRR 201-7.2

This section of Part 201-7 specifies the criteria that needs to be met in order to restrict emissions to avoid applicable federal requirements using federally enforceable permit conditions in a Title V permit.

6NYCRR 202-1.2

This regulation specifies that the department is to be notified at least 30 days in advance of any required stack test. The notification is to include a list of the procedures to be used that are acceptable to the department. Finally, free access to observe the stack test is to be provided to the department's representative.

6NYCRR 202-1.3

This regulation requires that any emission testing, sampling and analytical determination used to determine compliance must use methods acceptable to the department. Acceptable test methods may include but are not limited to the reference methods found in 40 CFR Part 60 appendix A and Part 61, appendix B. Alternate methods may also be used provided they are determined to be acceptable by

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the department. Finally, unless otherwise specified, all emission test reports must be submitted within 60 days after completion of testing.

6NYCRR 212 .10 (a) (2)

Owners and/or operators of facilities located outside of the lower Orange County and New York City metropolitan areas with an annual potential to emit of 100 tons or more of nitrogen oxides or 50 tons or more of volatile organic compounds must comply with the requirements of this section.

This facility has capped its VOC emissions in order to avoid this RACT requirement.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to a particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 221 .2

No person shall engage in or allow surface coating by the spraying of asbestos or asbestos-containing materials.

6NYCRR 225-1.2 (a) (2)

This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.8 (a)

Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years

6NYCRR 225-1.8 (d)

This requires that sampling, compositing and analysis of fuel samples must be done in accordance with methods acceptable to the commissioner.

6NYCRR 226

This regulation specifies the general requirements, equipment specifications and operating requirements for open-top vapor, conveyORIZED and cold cleaning degreasers.

6NYCRR 227 .2 (b) (1)

This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6NYCRR 227-1.3

This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

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6NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-1.6 (a)

This regulation requires that any facility found in violation of the provisions of Part 227 must not operate the affected stationary combustion installation that is in violation unless it is equipped with approved emission control equipment, it is rehabilitated or upgraded in an approved manner; or the fuel is changed to an acceptable type

6NYCRR 227-1.6 (b)

This regulation states that the Department may seal the affected stationary combustion installation that does not comply with the provisions in subdivision 6 NYCRR 227-1.6(a) within the time provided.

6NYCRR 227-1.6 (c)

This regulation state that no person may operate any affected stationary combustion installation sealed by the commissioner in accordance with this Part 227.

6NYCRR 227-1.6 (d)

This regulation states that no person except Department personnel may remove, tamper with, or destroy any seal affixed to any affected stationary combustion installation.

6NYCRR 228 .1 (d)

This citation states that any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228, will remain subject to these provisions even if the annual potential to emit volatile organic compounds for the facility later falls below the thresholds set forth in this regulation.

6NYCRR 228 .10

This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6NYCRR 228 .2 (b) (35)

This citation specifies the formula used to calculate the maximum permitted pounds of volatile organic compound per gallon of coating specified in tables 1 and 2 of 6 NYCRR Part 228.

6NYCRR 228 .3 (a)

This citation prohibits the use of coatings that exceed the maximum permitted pounds of volatile organic compounds per gallon, unless a coating system meeting certain requirements is used.

6NYCRR 228 .3 (c)

This citation specifies a minimum 85 percent overall removal efficiency for an air cleaning device used as a control strategy and how to determine this efficiency.

6NYCRR 228 .4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6NYCRR 228 .5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to

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maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228 , to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

6NYCRR 228 .5 (b)

This citation requires the owner and operator of any emission source subject to Part 228 to, upon request by the Department, use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, to measure the volatile content, water content, density, volume of solids and weight of solids in order to determine the actual VOC content of an applied coating during a compliance demonstration.

6NYCRR 228 .5 (c)

This citation allows alternate sampling and analysis methods to be used, subject to the approval of the Department and the Administrator.

6NYCRR 228 .5 (d)

This citation allows representatives of the Department to obtain coating samples during reasonable business hours, for the purpose of determining compliance.

6NYCRR 228 .5 (e) (2)

This citation specifies how to evaluate control equipment other than volatile organic compound (VOC)/ solvent recovery systems, and the methods to determine removal efficiency.

6NYCRR 228 .5 (f)

The owner and/or operator of a surface coating process must follow the applicable notification requirements, protocol requirements and test procedures of Part 202 of this Title for testing and monitoring.

6NYCRR 228 .5 (g) (2)

This requires continuous monitors measure the temperature rise across catalytic incinerator bed when an air cleaning device is used.

6NYCRR 228 .5 (j)

This requires any information or record showing noncompliance with the requirements of Part 228 to be reported to Department within 30 days of generation of the information or record..

6NYCRR 228 .5 (k)

This requires all records required by this regulation to be maintained at the facility for a period of five years

6NYCRR 228 .7

Table 1 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

6NYCRR 228 .8

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Table 2 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Short Description	Regulation
FACILITY	COMPLIANCE ASSURANCE MONITORING	40CFR 64
Reason: Tyco has been deemed exempt from the Compliance Assurance Monitoring (CAM) rule due to:		
A) This permit contains a cap to limit VOC emissions to less than the major source threshold of 50 tons/year; and		
B) This permit contains a continuous compliance determination method on their catalytic oxidizer which consists of continuous chart recording of minimum oxidizer inlet temperature (750 degrees F).		

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at TYCO HEALTHCARE KENDALL:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
U-00002/-/002	record keeping/maintenance procedures	67
U-00002	record keeping/maintenance procedures	66
U-00002/-/002/S0002	record keeping/maintenance procedures	81
U-00002/-/002/S0002	record keeping/maintenance procedures	82
U-00008	record keeping/maintenance procedures	86
U-00008	record keeping/maintenance procedures	87
U-00008	record keeping/maintenance procedures	88
U-00008	record keeping/maintenance procedures	89
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
FACILITY	record keeping/maintenance procedures	25
FACILITY	record keeping/maintenance procedures	27
FACILITY	record keeping/maintenance procedures	29
FACILITY	record keeping/maintenance procedures	7
FACILITY	record keeping/maintenance procedures	94
U-00002	intermittent emission testing	65
FACILITY	monitoring of process or control device parameters as surrogate	34
FACILITY	work practice involving specific operations	35
U-00001	record keeping/maintenance procedures	61
FACILITY	record keeping/maintenance procedures	37
U-00001	intermittent emission testing	64
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Basis for Monitoring

Condition 5: A non-specific requirement which states that emission exceedences must be reported to the Department.

Condition 6: A general requirement which outlines reporting practices.

Condition 7; Emission statements must be submitted evry April 15.

Condition 25: A description of Tyco's Operational Flexibility agreement.

Condition 31: Requires Tyco to perform daily analysis of visible emissions from EU's 7 & 10.

Condition 32: Limits residual fuel sulfur content to 1.5%.

Condition 34: Details cold cleaning degreaser descriptions and operations.

Condition 41: States that the VOC content of coatings must not exceed the limits stated in Tables 1 and/or 2.

Condition 42: Tyco must perform daily visible emissions observations.

Condition 43: Tyco must maintain coating (VOC content) documents.

Condition 44: Tyco must keep records about VOC content of coatings (EU's 2 & 10).

Condition 39: Alternative sampling methods details (EU's 2 & 10).

Condition 46: Noncompliance with Part 228 must be reported.

Condition 47: Must maintain Part 228 records for 5 years.

Condition 48: Details on waste VOC handling.

Condition 58: Records to be kept for fuel oil shipments.

Condition 59: EU 1: Perform daily opacity checks.

Condition 60: Establishes opacity standards and Reference Method for EU 1.

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- Condition 61: Establishes PM content and throttle limit setting for boiler.
- Condition 62: Establishes PM generation per fuel usage.
- Condition 63: EU 2: Establishes VOC emission maximums.
- Condition 64: Physical or operational changes must be reported to DEC.
- Condition 74: Catalytic oxidizer must perform at 85% or more.
- Condition 76: Establishes proper test procedures for stack testing the catalytic oxidizer.
- Condition 77: Inlet temperature of catalytic oxidizer must run at 750 degrees F.
- Condition 78: Keep records of solvent applied.
- Condition 79: Two years of VOC records to be kept (EU 2).
- Condition 83: Report leaks in Curafoam process.
- Condition 84: Notify DEC of polyurethane foam emission limitation changes.
- Condition 85: Diisocyanate leak/repair info to be reported.
- Condition 86: Keep MSDS sheets.
- Condition 87: Coating material limited to 2.9 #/gal.
- Condition 91: Cap VOC PTE's at 99,800 #/yr.
- Condition 92: Cap HAPs at 9.5 and 24.5 tons/yr for individual and aggregate respectively.
- Condition 94: Establishes a complaint protocol.