



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 6-3022-00014/00031

Renewal Number: 2

06/02/2011

Facility Identification Data

Name: TYCO HEALTHCARE KENDALL
Address: 130 S MAIN ST|DBA / COVIDIEN
ORISKANY FALLS, NY 13425

Owner/Firm

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

Permit Contacts

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UTICA, NY 13501

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ORISKANY FALLS, NY 13425

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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

This permit is for Renewal #2 of a Title V Permit. Some facility changes are being brought into this Renewal. Emission Units #4 and #10 have been removed from the facility, so the



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related EUs, Processes, Sources and Emission Units are similarly being removed. An older catalytic oxidizer has been removed and then replaced by a new RTO, so these changes have been made.

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.)

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:

Tyco Healthcare manufactures medical bandages, athletic wrap tape, burn ointments, anti-microbial salves, medical body-oriface tubes and other wound-care related items. The facility boiler is 25 MMBtu/hr and now has been reconfigured to fire #2 oil; sulfur dioxide is the air contaminant that necessitates a Title V Permit. This facility blows flexible polyurethane foam for bandage production. A web pressure-sensitive tape coating line applies a VOC & HAP adhesive, but due to the installation of an RTO, ***** is avoided. 40CFR60-Subpart RR applies. The facility manufactures a hydrophylic wound dressing, where traces of IPDI, acrylic acid and benzene are emitted. Tyco caps HAPs below the major source threshold to avoid 40CFR63-Subpart OOOO and 40CFR63-Subpart JJJJ.

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



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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.

TYCO HEALTHCARE KENDALL is defined by the following emission unit(s):

Emission unit U00001 - This emission unit consists of a Cleaver-Brooks 25 MMBtu/hr Package Boiler that, in 10/2010 was reconfigured to fire on #2 fuel oil.

Emission unit U00001 is associated with the following emission points (EP):
00001

Process: 01A is located at Building 5 - This process consists of the combustion of #2 fuel oil in a 25 MMBtu/hr Cleaver-Brooks ackage boiler.

Emission unit U00002 - This EU consists of the manufacture of pressure sensitive tape in the Expandover fabric coating operation. Three different coatings are applied to this web.

Emission unit U00002 is associated with the following emission points (EP):
00003, 00018, 00019, 00024

Process: 002 is located at Building 1 - This process is the application of adhesive coating (Hero 204N-T) in the Expandover operation. This process's pre-control VOC emissions exceed 50 tons/yr. An RTO controls these emissions. At times when the RTO is operating, nearly empty Hero drums vent-off and these vented VOC & HAP is destroyed.

Process: 003 is located at Building 1 - At times when the RTO is not running, the nearly empty Hero drums will vent thru EP 00024 directly to the outdoor atmosphere.

Process: 004 is located at Building 1 - This process consists of the acrylic and vinyl coating operations, which are pre-coats for the Expandover adhesive coating application. These two coatings are regulated by Part 228, they are low VOC and they exhaust directly to the atmosphere via EPs 00018 and 00019.

Emission unit U00006 - This EU consists of the manufacture of intubation devices (tubes), that have the product names "PEGs and Enteral Access". Bonding and inkjet printing (labelling) occur here.

Emission unit U00006 is associated with the following emission points (EP):



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Process: 008 is located at Building 5 - This process consists of the bonding and inkjet printing (labeling) of intubation devices, which are called PEGs and Enteral Accesss. The process exhaust thru EP 00020.

Emission unit U00007 - This EU consists of the formulation and mixing operations of hydrophyllic wound care dressings whose trade names are "Aqua-Flo and Curafil".

Emission unit U00007 is associated with the following emission points (EP):
00021, 00022, 00023

Process: 009 is located at Building 2 - Tnis process consists of the formulation and mixing of hydrophyllic wound care dressings, which are called Aqua-Flo and Curafill. The process has 3 EPs: 00021, 00022 and 00023.

Emission unit U00008 - This EU consists of the blowing of flexible polyurethane foam, which becomes the basis of Curafoam/Copa wound dressings.

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

Process: 010 is located at Building 2 - This process consists of the blowing of slabstock flexible polyurethane foam. A medicated bandage is built onto this absorbant surface. 40 CFR 63- Subpart III applies to this process. The bandage line is called Curafoam & Copa. The process embodies an ozone control system that utilizes a Corona treatment system.

Title V/Major Source Status

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

Prior to October 2010, Tyco burned #6 fuel oil in its boiler, so sulfur dioxide was the contaminant that gave Tyco a major source status.

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

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TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

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

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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.

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

1-01-007-01	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - PROCESS GAS Boilers > 100 MBTU/HR
1-02-005-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL 10-100MMBTU/HR **
3-01-060-11	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PHARMACEUTICAL PREPARATIONS
3-03-015-83	Coating Process PRIMARY METAL PRODUCTION PRIM METAL PROD-INTEGRATED IRON & STEEL MFG (SEE 3-03-008 & 3-03-009)
4-02-007-01	MISC. COMBUSTION SOURCES: SOAKING PITS SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Adhesive Application
5-02-005-07	SOLID WASTE DISPOSAL - COMMERCIAL/INSTITUTIONAL SOLID WASTE DISPOSAL: COMMERCIAL - INCINERATION: SPECIAL PURPOSE INCINERATION: SPECIAL PURPOSE (VOC

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CONTAMINATED SOIL)

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service 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 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 or 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
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 - 6 NYCRR 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;

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- (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 - 6 NYCRR 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item 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 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation

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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 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



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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.

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

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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	Condition	Short Description
-- FACILITY	ECL 19-0301	92	Powers and Duties of the Department with respect to air
U-00002/-/002	40CFR 60-A.11	75	pollution control General provisions - compliance with standards and maintenance requirements
U-00002/-/002	40CFR 60-A.12	76	General provisions - Circumvention
U-00002/-/002	40CFR 60-A.13	77	General provisions - Monitoring requirements
FACILITY	40CFR 60-A.14	53	General provisions - Modification
U-00002/-/002	40CFR 60-A.15	78	General provisions - Reconstruction
FACILITY	40CFR 60-A.4	52	General provisions - Address
U-00002/-/002	40CFR 60-A.7(a)(4)	71	Notification and Recordkeeping
U-00002/-/002	40CFR 60-A.7(b)	72	Notification and Recordkeeping
U-00002/-/002	40CFR 60-A.7(f)	73	Notification and Recordkeeping
U-00002/-/002	40CFR 60-A.9	74	General provisions - Availability of information
U-00002	40CFR 60-RR.440(b)	69	Pressure Sensitive Tape and Label Surface Coating Operations
U-00002/-/002/S0002	40CFR 60-RR.445(d)	82	Pressure Sensitive Tape and Label Surface Coating Operations - monitoring of operations and recordkeeping
FACILITY	40CFR 60-RR.445(h)	54	Pressure Sensitive Tape and Label Surface Coating Operations - monitoring of operations and recordkeeping

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FACILITY	40CFR 63-A.10	58, 59	Recordkeeping and Reporting
FACILITY	40CFR 63-A.4	55	Prohibited Activities and Circumvention
U-00008	40CFR 63-A.6(b)(2)	85	Compliance dates for new and reconstructed sources
FACILITY	40CFR 63-A.6(e)(1)(i)	56	Operation and Maintenance (MACT Gen. Prov.)
FACILITY	40CFR 63-A.9	57	Notification Requirements
U-00008	40CFR 63-III.1293	86	Slabstock polyurethane foam production standards
U-00008	40CFR 63-III.1294	87	Slabstock flexible polyurethane foam standards - diisocyanate emissions
FACILITY	40CFR 63-III.1306	60	Flexible Polyurethane Foam Production Reporting Requirements
U-00008	40CFR 63-III.1306(e)	88	Reporting Requirements-Semiannual Reports
U-00008	40CFR 63-III.1306(f)	89	Reporting Requirements-Other reports
FACILITY	40CFR 63-III.1307(b)	61	Recordkeeping Requirements - Equipment Leak Records
U-00008	40CFR 63-III.1307(b)	90	Recordkeeping Requirements - Equipment Leak Records
U-00008	40CFR 63-III.1307(e)	91	Recordkeeping Requirements - HAP Content
FACILITY	40CFR 63-JJJJ	29	Paper & Other Web Coating MACT
FACILITY	40CFR 63-O000	29	Printing, Coating, and Dyeing of Fabrics
FACILITY	40CFR 64.9	62	CAM - Reporting and recordkeeping requirements
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	93	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of

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FACILITY	6NYCRR 201-3.1(a)	23	collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exemptions and Trivial Activities - State Regulated Sources Exempt from Permit
FACILITY	6NYCRR 201-3.3(a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	24, 63, 64	Trivial Activities - proof of eligibility Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	15	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2	General conditions
FACILITY	6NYCRR 201-6.5(a)(8)	16	Fees
FACILITY	6NYCRR 201-6.5(c)	3	General conditions Permit conditions for Recordkeeping and Reporting of
FACILITY	6NYCRR 201-6.5(c)(2)	4	Compliance Monitoring Permit conditions for Recordkeeping and Reporting of
FACILITY	6NYCRR 201- 6.5(c)(3)(ii)	5	Compliance Monitoring Permit conditions for Recordkeeping and Reporting of
FACILITY	6NYCRR 201-6.5(d)(5)	17	Compliance Monitoring Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)	25	Operational flexibility
FACILITY	6NYCRR 201-6.5(f)(6)	18	Off Permit Changes
FACILITY	6NYCRR 201-6.5(g)	26	Permit shield
FACILITY	6NYCRR 201-7.2	27, 28, 29	Emissions capping using synthetic minor permits
FACILITY	6NYCRR 202-1.1	19	Required emissions tests.
FACILITY	6NYCRR 202-1.2	30	Notification.
FACILITY	6NYCRR 202-1.3	31, 32, 33	Acceptable procedures.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	94, 95	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 212.10(a)(2)	28	NOx and VOC RACT required at major facilities
FACILITY	6NYCRR 212.4(a)	96	General Process Emission Sources - emissions from new sources and/or

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U-00002	6NYCRR 212.4 (c)	68	modifications General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6 (a)	34	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 221.2	97	Prohibition.
U-00001/-/01A/S0001	6NYCRR 225-1.2 (a) (2)	67	Sulfur in Fuel Limitations Post 12/31/87.
FACILITY	6NYCRR 225-1.8 (a)	35	Reports, sampling and analysis.
FACILITY	6NYCRR 225-1.8 (d)	36	Reports, sampling, and analysis
FACILITY	6NYCRR 226	37	SOLVENT METAL CLEANING PROCESSES
U-00001	6NYCRR 227.2 (b) (1)	66	Particulate emissions.
FACILITY	6NYCRR 227-1.3 (a)	38	Smoke Emission Limitations.
U-00001	6NYCRR 227-1.3 (a)	65	Smoke Emission Limitations.
FACILITY	6NYCRR 227-1.6 (b)	39	Corrective Action: Facility Shutdown.
FACILITY	6NYCRR 227-1.6 (c)	40	Corrective Action: Facility Shutdown Prohibitions.
FACILITY	6NYCRR 227-1.6 (d)	41	Corrective Action: Facility Shutdown Prohibitions.
FACILITY	6NYCRR 228-1.1 (d)	42	Will remain subject
FACILITY	6NYCRR 228-1.10	51	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 228-1.2 (b) (35)	43	Formula for Maximum permitted VOC content
FACILITY	6NYCRR 228-1.3 (a)	28	Recordkeeping, reports for VOCs
FACILITY	6NYCRR 228-1.3 (c)	44	Solids as applied
U-00002/-/002/C0002	6NYCRR 228-1.3 (c)	79	Solids as applied
FACILITY	6NYCRR 228-1.4	45	Opacity
FACILITY	6NYCRR 228-1.5 (a)	46	VOC recordkeeping by the facility
U-00002/-/002	6NYCRR 228-1.5 (b)	70	Use of Methods 311 or 24.
U-00002/-/004	6NYCRR 228-1.5 (b)	83	Use of Methods 311 or 24.
FACILITY	6NYCRR 228-1.5 (c)	47	Alternate sampling and analysis methods
FACILITY	6NYCRR 228-1.5 (e) (2)	48	Demonstration of other than VOC solvent recovery
U-00002/-/002/C0002	6NYCRR 228-1.5 (f)	80	Testing and monitoring; Methods 18, 25 and 25A
U-00002/-/002/C0003	6NYCRR 228-1.5 (g) (1)	81	Air cleaning device exhaust gas temperature monitoring



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FACILITY	6NYCRR 228-1.5 (j)	49	Record of noncompliance Records maintained for five years Table 1
FACILITY	6NYCRR 228-1.5 (k)	50	
U-00002/-/004	6NYCRR 228-1.7	84	

Applicability Discussion:

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

ECL 19-0301

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.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 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

6 NYCRR 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.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It



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

6 NYCRR 201-6.5 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.5 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.5 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 201-6.5 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.5 (e)



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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.

6 NYCRR 201-6.5 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 202-2.1

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

6 NYCRR 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.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 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 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

This Part lists the regulated substances and there 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



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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:

40 CFR 60.11

40 CFR 63-Subpart RR (Pressure Sensitive Tape) applies to the Expandover Adhesive coating line. Subpart A is the general reg that underlies RR. 40CFR60.11 is utilized here to regulated opacity from this EP.

40 CFR 60.12

40 CFR 63-Subpart RR (Pressure Sensitive Tape) applies to the Expandover Adhesive coating line. Subpart A is the general reg that underlies RR. 40CFR60.12 is utilized here to stipulate that no emission shall be willfully masked..

40 CFR 60.13

40 CFR 63-Subpart RR (Pressure Sensitive Tape) applies to the Expandover Adhesive coating line. Subpart A is the general reg that underlies RR. 40CFR60.13 is utilized here to stipulate that monitoring equipment shall be maintained.

40 CFR 60.14

Subpart A language: Within 180 days after a physical or operational change at the facility, all applicable standards must be restored.

40 CFR 60.15

40 CFR 63-Subpart RR (Pressure Sensitive Tape) applies to the Expandover Adhesive coating line. Subpart A is the general reg that underlies RR. 40CFR60.15 is utilized here to stipulate that any future reconstruction of Process 002 shall be fully disclosed..

40 CFR 60.4

40 CFR 60.4 is used here to communicate the correct EPA mailing address for Tyco.

40 CFR 60.440 (b)

40 CFR 60.440(b) states that Subpart RR will apply to EU-00002 if Tyco's application of VOC exceeds 45 Megagrams per 12-month period.



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40 CFR 60.445 (d)

40 CFR 60.445(d) requires that an RR regulated facility keep records for the amount of solvent applied on a 12-month rolling total basis.

40 CFR 60.445 (h)

Pertinent to Subpart RR, all records shall be retained for at least 2 years.

40 CFR 60.7 (a) (4)

40 CFR 60.7(a)(4) requires that a Subpart RR (and therefore Subpart A) regulated facility notify the EPA if any change is to be made that will increase emissions.

40 CFR 60.7 (b)

40 CFR 60.7(b) requires that an RR regulated facility shall maintain records of startup, shutdown and malfunction events.

40 CFR 60.7 (f)

40 CFR 60.7(f) requires that an RR regulated facility keep records about CPMS device maintenance.

40 CFR 60.9

40 CFR 60.9 is from Subpart A. This refers to Process 002. This reg refers to public information.

40 CFR 63.10

40 CFR 63.10 requires that files be kept for Process 002.

40 CFR 63.1293

40 CFR 63.1293 is from Subpart III, which applies to EU 00008; flexible polyurethane foam. If Tyco changes to the use of a HAP ABA, then other regs will apply.

40 CFR 63.1294

40 CFR 63.1294 refers to leaks in pumps. This is from Subpart III, which applies to EU-00008.

40 CFR 63.1306

40 CFR 63.1306 requires an initial

40 CFR 63.1306 (e)

40 CFR 63.1306(e) requires reporting for any Subpart III leak that was not fixed in accord with 1294(c).



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40 CFR 63.1306 (f)

40 CFR 63.1306(f) requires reporting for any change made to Tyco's flexible foam emission limitation.

40 CFR 63.1307 (b)

In EU 00008, for Subpart III: keep records on diisocyanate leaks.

40 CFR 63.1307 (e)

40 CFR 63.1307(e) requires MSDS sheets for any use of HAP equipment cleaner.

40 CFR 63.4

Subpart A: Concealment of emissions not allowed.

40 CFR 63.6 (b) (2)

The regs sets dates for the compliance of any future reconstructed source.

40 CFR 63.6 (e) (1) (i)

This reg requires adherence to SSM plans.

40 CFR 63.9

CAM applies to Process 002 because the VOC PTE for pre-control emission exceeds 50 ton/yr. Tyco shall keep the combustion chamber temperature above 1643 degrees F while Hero 204N-T coating is underway.

40 CFR 64.9

Tyco shall notify the EPA of any intent to construct a new source.

40 CFR Part 63, Subpart JJJJ

Tyco elects to avoid 40 CFR 63-Subpart JJJ by capping their HAPs below major the source threshold.

40 CFR Part 63, Subpart OOOO

Tyco elects to avoid 40 CFR 63-Subpart OOOO by capping their HAPs below the major source threshold.

6 NYCRR 201-3.1 (a)

This is a standard and required regulation, it sets the gameplan for exempt and trivial



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sources.

6 NYCRR 201-6.5 (f)

This regulation asserts the Op-Flex option.

6 NYCRR 201-7.2

Tyco uses 201-7.2 in two places; they have a 49.9 ton VOC cap and a 9.5/24.5 ton HAP cap. The HAP cap enables Tyco to avoid Subpart JJJ and Subpart OOOO and also to avoid any futuristic MACT rules.

The purpose for the 49.9 ton VOC cap is less clear. Years ago, the cap was needed for different reasons, when emissions were higher and Tyco had more and varied operations. Today, the cap will not provide any Table 1 or Table 2 advantage that Tyco does not already have, as each of the three Expandover coatings are each less than 2.9 lbs/gal.

Today, the oxidizer (RTO) is required as it reduces hexane emission to less than 10 tons per year, the major source threshold; this level enables avoidance of JJJ and OOOO. The hexane comes from the Hero 204N-T (22.45%) adhesive coating.

6 NYCRR 202-1.2

This reg is required. It mandates a stack test protocol.

6 NYCRR 202-1.3

A required regulation. It mandates that EPA reference methods be adhered to on stack tests.

6 NYCRR 212.10 (a) (2)

The 49.9 ton VOC cap enables Tyco to avoid 6 NYCRR 212.10(a)(2), which is 212 RACT.

6 NYCRR 212.4 (a)

Tyco requested this regulation for unclear reasons. It is believed to be a reminder to them that DAR-1 modeling would be required if a future source were to be added that emitted A-rated HAPs.

6 NYCRR 212.4 (c)

A standard regulation; it limits the grain-loading of PMs.



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6 NYCRR 212.6 (a)

A standard regulation; it limits opacity to 20%.

6 NYCRR 221.2

A required regulation; it limits the use of asbestos.

6 NYCRR 225-1.2 (a) (2)

This regulation limits the sulfur content of fuel oil to 1.5% by weight.

6 NYCRR 225-1.8 (a)

This is a required regulation, Tyco must keep #2 fuel oil bills of lading that show the date, volume and the sulfur content.

6 NYCRR 225-1.8 (d)

This reg has been omitted from this permit.

6 NYCRR 227.2 (b) (1)

This regulation limits particulates to 0.01 lbs of PM per million BTU of the boiler. This limit shall be verified by stack test once per permit term.

6 NYCRR 227-1.3 (a)

This regulation limits boiler opacity to 20%.

6 NYCRR 227-1.6 (b)

The NYSDEC may seal the boiler if we deem proper.

6 NYCRR 227-1.6 (c)

Tyco may not unseal a sealed boiler.

6 NYCRR 227-1.6 (d)

Tyco shall not tamper with a seal on a boiler.

6 NYCRR 228-1.1 (d)

This is "Once in, always in" for Part 228.

6 NYCRR 228-1.10

This regulation requires inspections for coating areas; mostly for open coating



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containers, wet rags, etc.

6 NYCRR 228-1.2 (b) (35)

In the absence of good manufacturer VOC-content information, this equation must be used to determine the VOC-content less water and exempt VOC.

6 NYCRR 228-1.3 (a)

6 NYCRR 228-1.3 (c)

This equation must be used to calculate DRE.

6 NYCRR 228-1.4

This regulation limits opacity from coating emission points to 20%.

6 NYCRR 228-1.5 (a)

Tyco shall maintain records (MSDS, TDS, etc) from coating suppliers that clearly designated the VOC-content and elutable VOC emissions per volume of coating.

6 NYCRR 228-1.5 (b)

A required regulation for surface coaters, in case where Tyco cannot procure MSDS from manufacturers, they shall determine VOC content, etc via RM 24 and/or RM 311.

6 NYCRR 228-1.5 (c)

The NYSDEC has the power to accept alternative methods to determine VOC-content.

6 NYCRR 228-1.5 (e) (2)

The NYSDEC is empowered to authorize DRE and capture efficiency evaluations.

6 NYCRR 228-1.5 (f)

A measure VOC concentrations in a coating operation's exhaust stream, EPA RM 18,25 or 25A shall be utilized.

6 NYCRR 228-1.5 (g) (1)

For Source C0003 (Adwest RTO), combustion chamber firing temperature shall not fall below 1643 degrees F (3 hour block average) while Expandover operations are underway.



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6 NYCRR 228-1.5 (j)

A required regulation. Tyco shall report any Part 228 noncompliance.

6 NYCRR 228-1.5 (k)

Records that apply to Part 228 functions shall be retained onsite for at least five years.

6 NYCRR 228-1.7

As applied coatings that are applied to fabric may not exceed 2.9 lbs/gallon less water and less exempt VOC unless the RTO is operating. The vinyl and the acrylic coating operations are always subject to 2.9 lbs/gal because they are always uncontrolled.

6 NYCRR Part 226

Tyco has numerous exempt/trivial cold cleaning degreasers; this regulation sets work practice rules.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	40 CFR Part 63, Subpart HHHHHH	NESHAP for Paint Stripping and Misc. Surface Coating Operations at Area Sources

Reason: At the time of this application for Renewal #2, Tyco reports that they do not use coatings whose formulations include any compounds of the "target HAPs" (cadmium, chromium, lead, manganese and nickel) per 40 CFR 63 Subpart HHHHHH; therefore Subpart HHHHHH does not apply to this facility. If at any time in the future, any target HAP might be formulated into a coating, or if a methylene chloride chemical stripper were to be utilized, then Subpart HHHHHH would apply.

FACILITY	6 NYCRR 228-1.8	Table 2
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Reason: Part 228 does not apply to either Emission Unit U-00006 or Process 008 (Enteral Access & PEGs) because these intubation tubes being coated are "Miscellaneous Plastic Parts" (Table 2 in 6 NYCRR 228-1.8) and this facility has capped VOC emissions below the 50 ton/yr threshold.

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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	Cond No.	Type of Monitoring
U-00002/-/002	71	record keeping/maintenance procedures
U-00002	69	record keeping/maintenance procedures
U-00002/-/002/S0002	82	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
U-00008	88	record keeping/maintenance procedures
U-00008	89	record keeping/maintenance procedures
FACILITY	61	record keeping/maintenance procedures
U-00008	90	record keeping/maintenance procedures
U-00008	91	record keeping/maintenance procedures
FACILITY	62	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	29	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	95	record keeping/maintenance procedures
U-00002	68	intermittent emission testing
FACILITY	34	monitoring of process or control device parameters as surrogate
U-00001/-/01A/S0001	67	work practice involving specific operations
FACILITY	35	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
U-00001	66	intermittent emission testing
FACILITY	38	monitoring of process or control device parameters as surrogate
U-00001	65	monitoring of process or control device parameters as surrogate
FACILITY	51	record keeping/maintenance procedures
FACILITY	43	record keeping/maintenance procedures
U-00002/-/002/C0002	79	intermittent emission testing
FACILITY	45	monitoring of process or control device parameters as surrogate
FACILITY	46	record keeping/maintenance procedures
U-00002/-/002	70	record keeping/maintenance procedures
U-00002/-/004	83	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures
U-00002/-/002/C0002	80	record keeping/maintenance procedures
U-00002/-/002/C0003	81	monitoring of process or control device parameters



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FACILITY	49	as surrogate
FACILITY	50	record keeping/maintenance procedures
U-00002/-/004	84	record keeping/maintenance procedures
		work practice involving specific operations

Basis for Monitoring

49.9 ton VOC Cap: Enables Tyco to avoid 212 RACT and enables them to avoid the use of compliant coatings for any future Part 228-1.8 Table 2 coating operation.

9.5/24.5 ton HAP cap: Enables Tyco to avoid 40 CFR 63-SubpartJJJ and also Subpart OOOO

6 NYCRR 212.6(a): 20% opacity limit for the referenced EPs

6 NYCRR 226: Work practice rules for cold cleaning degreasing operations

6 NYCRR 227-1.3(a): 20% opacity limit for the boiler

6 NYCRR 228-1.2(b)(35): Facility shall to use this equation for calculating VOC-content whenever MSDS is not available

6 NYCRR 228-1.3(c): Tyco shall use this equation to determine DRE for control devices

6 NYCRR 228-1.4: Tyco is limited to 20% opacity for all 228-regulated coating operation EPs

6 NYCRR 228-1.5(a): Facility to retain MSDS/TDS for each coating

6 NYCRR 228-1.10: tyco to perform coating operation inspections

40 CFR 63.1307(b): Addresses leaks in process 010

40 CFR 64.9: CAM applies to Source C0003, the RTO firing temperature shall not fall below 1643 degrees F while coating is underway

6 NYCRR 228.2(b)(1): PM limited to 0.01 pounds PM per MM Btu/hr for the boiler

6 NYCRR 225-1.2(a)(2): Fuel oil sulfur content limited to 1.5% by weight

6 NYCRR 212.4(c): PM grain loading limited to 0.05 grains per dry standard cubic foot of exhaust gas



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 6-3022-00014/00031

Renewal Number: 2

06/02/2011

40 CFR 60.440(b): Applied coating solvent limited to 45 Megagrams of VOC per 12 month period

6 NYCRR 228-1.5(g): RTO firing temp shall not fall below 1643 degrees F while coating is underway

6 NYCRR 228-1.7: For fabric coating operations (Expandover), VOC-content not to exceed 2.9 lbs/gal unless control is operated