

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 8-2614-00205/01801 Modification Number: 2**



**02/08/2007**

**Facility Identification Data**

Name: KODAK PARK DIVISION  
Address: 1669 LAKE AVE  
ROCHESTER, NY 14650

**Owner/Firm**

Name: EASTMAN KODAK CO  
Address: 343 STATE ST  
ROCHESTER, NY 14650, 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**

This is the second modification of the Title V permit for the Kodak Park facility which is an existing, large, integrated manufacturing plant that produces photographic films, papers, and synthetic organic

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chemicals. The facility's sources of air contaminant emissions are organized into 55 Emission Units. Since publication of the Notice of Complete Application in July 2006, Kodak's Photochemical Operations, represented by Emission Unit U-00027, were transferred to a new owner and are no longer included in this permit.

### Attainment Status

KODAK PARK DIVISION is located in the town of ROCHESTER in the county of MONROE. 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* ATTAINMENT)	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

The Kodak Park site is a large, integrated manufacturing plant producing photographic films, papers, and synthetic organic chemicals. The facility is located on approximately 1,300 acres in north central Monroe County. The developed portion of the site is bounded by the Genesee River to the east, Route 104/Eastman Ave to the north, Ridgeway Avenue to the south, and Route 390 to the west.

### Permit Structure and Description of Operations

The Title V permit for KODAK PARK DIVISION 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



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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.

KODAK PARK DIVISION is defined by the following emission unit(s):

Emission unit U00018 - SCREEN PRINTING PROCESSES AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00018 is associated with the following emission points (EP):  
06910

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

Process: R02 is located at and 205, Building 082 - SCREEN PRINTING USING PART 234 COMPLIANT INKS/COATINGS

Process: R03 is located at BLDG 69, Building 069 - SCREEN PRINTING USING EXEMPT INKS/COATINGS PER 6 NYCRR 234.1(h). SOURCES ARE ALSO SUBJECT TO THE 6 NYCRR 212.7(p) EXEMPTION FOR A-RATED VOCS. ONE SOURCE (ES 065AH) IS SUBJECT TO 6 NCYRR 201-6.5(f)(1) FACILITY-LEVEL REQUIREMENT FOR CONTEMPORANEOUS LOGGING OF ALTERNATE OPERATING SCENARIOS BECAUSE IT OPERATES UNDER PROCESS R02 AS WELL AS R03.

Emission unit U00045 - THIS EMISSION UNIT REPRESENTS AN R&D COATING MACHINE ("CS MACHINE") WHICH IS EXEMPT FROM VOC RACT REQUIREMENTS AT 6 NYCRR PART 228.1(H)(1) BECAUSE IT ONLY PRODUCES A PRODUCT FOR STUDY RATHER THAN SALE. IT IS ALSO EXEMPT FROM THE PAPER & OTHER WEB COATING MACT UNDER 63.3300(G) BECAUSE IT MEETS THE REQUIREMENTS OF A WEB COATING LINE DEFINED AS RESEARCH EQUIPMENT IN 63.3310. EU U-00045 WOULD HAVE BEEN EXEMPT FROM PERMITTING REQUIREMENTS, BUT WAS INCLUDED IN THE TITLE V PERMIT BECAUSE OF A VOC EMISSIONS CAP TO AVOID APPLICABILITY OF THE PSD(40 CFR 52.21) AND NSR(6 NYCRR PART 231) PROGRAMS. THIS CAP WENT INTO AFFECT IN 1993 AT THE TIME THE SOURCE WAS PERMITTED FOR COMMERCIAL MANUFACTURING. HOWEVER, PRODUCT COMMERCIALIZATION DID NOT OCCUR. PURSUANT TO PART 201, THE VOC CAP RENDERS THE OTHERWISE EXEMPT SOURCES INELIGIBLE FOR THE EXEMPTION FROM PERMITTING FOR TRIVIAL AND EXEMPT SOURCES IDENTIFIED IN SUBPART 201-3;

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THUS THESE SOURCES ARE INCLUDED IN THE TITLE V PERMIT. IN JULY 2004 A PROCESS CHANGE RESULTED IN THE ADDITION OF ACETONE EMISSIONS, NECESSITATING THE ADDITION OF A PART 212.4(A) CONDITION TO THE PERMIT.

Emission unit U00045 is associated with the following emission points (EP):  
08212

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

Process: S06 is located at 310 WING, Building 082 - RESEARCH AND DEVELOPMENT WEB COATING OF PLASTIC

Emission unit U00023 - SPID, MATERIALS HANDLING, MILLING AND MIXING OPERATIONS, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00023 is associated with the following emission points (EP):  
103A6, 11201, 112A1

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

Process: H06 is located at Building 112 - PARTICLE MILLING - RAW MATERIALS HANDLING, MILLING, AND MIXING OPERATIONS

Process: H07 is located at Building 103 - PARTICLE MILLING - BALL MILL OPERATIONS WITH VOLATILE ORGANIC COMPOUND EMISSION RATE POTENTIAL LESS THAN 3 POUNDS PER HOUR (LBS/HR).

Emission unit U00040 - HEALTH IMAGING INTENSIFYING SCREEN WEB COATING OPERATIONS, INCLUDING GRID IONIZERS, SOLUTION DELIVERY, AND SOLVENT CLEANING OPERATIONS ASSOCIATED WITH THE MANUFACTURE OF X-RAY SCREENS AND OTHER HEALTH IMAGING APPLICATIONS, AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00040 is associated with the following emission points (EP):  
01413, 01425, 01426, 01427

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

Process: J02 is located at Building 014 - PLASTIC/PAPER WEB SURFACE COATING PROCESS WITH COMPLIANT COATING SYSTEM

Process: J03 is located at Building 014 - GENERAL PROCESS EMISSION SOURCES WITH NOX EMISSIONS LESS THAN 3 LB/HR ERP (I.E. IONIZATION)

Process: J04 is located at Building 014 - NONHALOGENATED SOLVENT CLEANING OPERATIONS NOT REGULATED BY 40 CFR 63 SUBPART T OR 6 NYCRR PART 226

Process: J05 is located at Building 014 - HALOGENATED SOLVENT CLEANING OPERATIONS SUBJECT TO 40 CFR 63 SUBPART T

Process: J06 is located at Building 014 - R & D WEB SURFACE COATING PROCESS

Process: J08 is located at Building 014 - GENERAL PROCESS EMISSION SOURCES WITH VOC EMISSIONS LESS THAN 3 LB/HR ERP (I.E. SOLUTION STORAGE, HANDLING, PREPARATION & EVAPORATION).

Process: J09 is located at Building 014 - SOLVENT METAL CLEANING OPERATIONS SUBJECT TO 6 NYCRR PART 226

Emission unit U00011 - ACETATE FILM BASE MANUFACTURING OPERATIONS AND RELATED CLEANING, FILTERING, MAKING, MIXING, RECOVERY OPERATIONS/EQUIPMENT, MAINTENANCE, LABORATORY, AND RESEARCH &

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DEVELOPMENT, INCLUDING INCIDENTAL GASEOUS AND PARTICULATE FUGITIVE EMISSIONS.

Emission unit U00011 is associated with the following emission points (EP):  
05327, 05385, 05391, 05394, 05395, 053K5, 053L3, 053L6, 053L8, 053L9, 053M3, 053M4, 053M5,  
053M6, 053M7, 053M9, 053N0, 053N1, 053N2, 053N3, 053N4, 053N5, 053N6, 053N7, 053N8,  
05431, 05432, 05433, 05434, E1201

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

Process: E06 is located at also bldgs52, 53, 54, Building 055 - FILM BASE MANUFACTURING PROCESS EMISSIONS WHICH ARE NOT SUBJECT TO PART 228.

Process: E07 is located at and Bldg 045, Building 053 - HALOGENATED SOLVENT CLEANING OPERATIONS SUBJECT TO 40CFR63 SUBPART T.

Process: E08 is located at Building 053 - FILM BASE CASTING AND/OR COATING INCLUDING THE MAINTENANCE RELATED AIR SYSTEM EXHAUST VENTS - PART 228 WITH GREATER THAN 85% OVERALL REMOVAL.

Emission unit U00085 - BUILDING 59 WEB COATING OF PLASTIC/PAPER FOR PURPOSES OF RESEARCH AND DEVELOPMENT, AND RELATED SUPPORT OPERATIONS, INCLUDING INCIDENTAL FUGITIVE EMISSIONS. SUBJECT TO NSR CAP FOR VOC'S.

Emission unit U00085 is associated with the following emission points (EP):  
05902, 05987, 05995, 05999, 059K0, 059K1, 059K2, 059K3, 059K4

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

Process: S15 is located at Building 59, Building 059 - R&D COATING OF PLASTIC/ PAPER (EXEMPT FROM THE REQUIREMENTS OF PART 228).

Process: S17 is located at Building 59, Building 059 - GENERAL PROCESS EMISSION SOURCES WITH NO PARTICULATE EMISSIONS (E.G., MELT PREPARATION, SOLUTION DELIVERY & CAN WASHING).

Process: S21 is located at Building 059 - COMMERCIAL COATING OF PLASTIC / PAPER USING PART 228 COMPLIANT COATINGS

Process: S23 is located at Building 059 - GENERAL PROCESS EMISSION SOURCES USED FOR COMMERCIAL PRODUCTION WITH NO PARTICULATE EMISSIONS (E.G., MELT PREPARATION, SOLUTION DELIVERY & CAN WASHING).

Process: S26 is located at Building 059 - COATING OF PLASTIC/PAPER SUBJECT TO A PART 228 VOC RACT CAP

Emission unit U00088 - BUILDING 308 NEXPRERSS SURFACE COATING OPERATIONS SUBJECT TO MACT, INCLUDING SOLUTION DELIVERY, CURING, CLEANING AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00088 is associated with the following emission points (EP):  
082X1, 308C1

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

Process: N20 is located at Building 308 - SURFACE COATING OPERATIONS SUBJECT TO PART 228 RACT CAP FOR USE OF NON-COMPLIANT COATINGS AND PART 212 BACT REQUIREMENTS

Process: N21 is located at Building 308 - RESEARCH AND DEVELOPMENT SURFACE COATING OPERATIONS EXEMPT FROM PART 228.

Process: N22 is located at Building 082 - DISPERSION MAKING OPERATIONS SUBJECT TO

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**PART 212 BACT CAP FOR METHYLENE CHLORIDE AND PART 212 BACT TABLE 2 REQUIREMENTS**

Emission unit U00087 - B349 TONER MANUFACTURING OPERATIONS; INCLUDING PULVERIZING, OXIDIZING & CLASSIFYING; AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00087 is associated with the following emission points (EP):

34901, 349A5, 349B5, 349B6, 349B7, 349B8, 349C2, 349C3, 349C8, 349C9, 349D0, 349D2, 349D3, 349D4, 349D5, 349D6, 349D7, 349E0, 349E1, 349E2, 349E3, 349E4, 349E5, 349E6, 349E7, 349E8, 349E9, 349F0, 349F1, 349F2, 349F3

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

Process: N10TONER MANUFACTURING GENERAL PROCESS EMISSION SOURCES WITH VOC AND/OR NOX EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LBS/HR.

Emission unit U00069 - GENERAL PROCESS EMISSION SOURCES ASSOCIATED WITH HEALTH IMAGING INTENSIFYING SCREEN MANUFACTURING, INCLUDING EQUIPMENT ASSOCIATED WITH MIXING, MATERIAL PROCESSING, PRECIPITATION, AND REDUCTION OPERATIONS, AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00069 is associated with the following emission points (EP):

01207, 035P4, 035P5, 035P9, 08119, 08120, 11706, 117A0

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

Process: J01 is located at also Bldgs 035 & 117, Building 012 - IMAGE ENHANCING SCREEN MANUFACTURING PROCESSES, INCLUDING MIXING, MATERIAL PROCESSING, PRECIPITATION, AND REDUCTION OPERATIONS

Process: J07 is located at also Bldg 117, Building 012 - GENERAL PROCESS EMISSION SOURCES WITH NO PARTICULATE EMISSIONS (ie. CLEANING, SEALING, AND PRINTING).

Process: J10 is located at Building 081 - PREPARATION OF COATING SOLUTIONS

Process: J11 is located at Building 081 - PAPER/PLASTIC SURFACE COATING USING PART 228 COMPLIANT COATINGS NOT SUBJECT TO P&OW MACT

Process: J12 is located at Building 081 - PAPER/PLASTIC SURFACE COATING FOR PURPOSES OF RESEARCH AND DEVELOPMENT

Emission unit U00079 - BUILDING 119 BATCH SYNTHETIC CHEMICALS MANUFACTURING OPERATIONS SUBJECT TO BUILDING 119 VOC RACT CAP (VOLATILE ORGANIC COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY) INCLUDING ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00079 is associated with the following emission points (EP):

119E5, 119E9, 119J3, 119KC, 119X1, 119X2, 119X3, 119X4, 119X5, 119X6, 119X8, 119X9

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

Process: I06 is located at Building 119 - BATCH POLYMER AND ORGANIC CHEMICAL MANUFACTURING OPERATIONS WITH SOLID PARTICULATE EMISSIONS AT SELECT EMISSIONS SOURCES WITHIN THIS PROCESS.

Process: I08 is located at Building 119 - BATCH CHEMICAL MANUFACTURING DRYING AND CHEMICAL HANDLING OPERATIONS INCLUDING LOADING AND UNLOADING STATIONS WITH SOLID PARTICULATE EMISSIONS AT SELECT EMISSIONS SOURCES WITHIN THIS PROCESS AND ARE SUBJECT TO THE BUILDING 119 VOC RACT (VOLATILE ORGANIC COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY) CAP.

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Process: I10 is located at Building 119 - BUILDING 119 BATCH CHEMICAL FORMULATION OPERATIONS SUBJECT TO BUILDING 119 VOC RACT (VOLATILE ORGANIC COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY) CAP.

Process: I12 is located at Building 119 - BUILDING 119 J WING PILOT AND BATCH CHEMICAL MANUFACTURING OPERATIONS SUBJECT TO BUILDING 119 VOC RACT (VOLATILE ORGANIC COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY) CAP, WITH SOLID PARTICULATE EMISSIONS AT SELECT EMISSIONS SOURCES WITHIN THIS PROCESS.

Emission unit U00014 - SILVER FLOW - NO. 4 SMELTER POURING OPERATIONS AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00014 is associated with the following emission points (EP):  
10105, 10109

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

Process: H31 is located at Building 101 - SLAG MOLD POURING/COOLING, AND SILVER CASTING, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES.

Emission unit U00084 - BUILDING 308 WEB COATING OF PLASTIC/PAPER/METAL COIL, AND RELATED SUPPORT OPERATIONS. SUBJECT TO NSR CAP FOR VOCS.

Emission unit U00084 is associated with the following emission points (EP):  
308B5, 308B6, 308B7, 308B8, 308C0

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

Process: G01 is located at Building 308 - R & D COATING OF PLASTIC/PAPER/METAL COIL

Process: G02 is located at Building 308 - COATING MACHINE EQUIPMENT GENERATING NOX EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LB/HOUR ERP AND LESS THAN 15 LB/DAY (IE., CORONA DISCHARGE TREATMENT UNIT AND NATURAL GAS FIRED DRYER)

Process: G03 is located at Building 308 - PARTS CLEANING OPERATIONS USING VOCS SUBJECT TO PART 226.

Process: G04 is located at Building 308 - PARTS CLEANING OPERATIONS USING SOLVENTS NOT REGULATED BY 6 NYCRR 226 OR 40 CFR 63 SUBPART T

Process: G05 is located at Building 308 - GENERAL PROCESS EMISSION SOURCES (IE., MIXING, SAMPLE DRYING, SOLVENT STORAGE, WASTE COLLECTION/DISPOSAL, QC MEASUREMENT & GENERAL ROOM VENTILATION)

Emission unit U00019 - SILVER FLOW SILVER NITRATE OPERATIONS AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00019 is associated with the following emission points (EP):  
14302, 14303

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

Process: H39 is located at Building 143 - SILVER NITRATE MANUFACTURING AND PURIFICATION OPERATIONS, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES

Emission unit U00020 - SEMICONDUCTOR RESEARCH AND MANUFACTURING AREA INCLUDING FABRICATION, MIXING, FILTERING, CLEANING OPERATIONS, MAINTENANCE AND ASSOCIATED FUGITIVE EMISSIONS

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Emission unit U00020 is associated with the following emission points (EP):  
08101, 08102, 08103, 08104, 08105, 08109, 08110, 08111, 08121, 08122

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

Process: N01 is located at Building 081 - SEMI CONDUCTOR MANUFACTURING WITH VOC AND NOX EMISSIONS LESS THAN 3.0 LBS/HR ERP

Process: N02 is located at Building 081 - CLEANING AND DEGREASING OF MISCELLANEOUS PARTS

Process: N03 is located at Building 081 - COATING OF GLASS SUBSTRATE UTILIZING LOW VOLUME EXEMPTION 6 NYCRR 228.1(e)(13), EXEMPT FROM NYCRR PART 212 PER 212.7(1), AND EXEMPT ACTIVITY UNDER PART 201-3.2(c)(31).

Emission unit U00021 - DISTILLING EAST MANUFACTURING OPERATIONS INCLUDING SOLVENT DISTILLATION, STEAMING AND STORAGE AND DRUM FILLING OPERATIONS, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00021 is associated with the following emission points (EP):  
11501, 11601, 12007, 120A5, 120A9, 120B0, 14201, D6305

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

Process: H02 is located at also Bldg 120, Building 116 - DISTILLING EAST OPERATIONS WITH VOLATILE ORGANIC COMPOUND (VOC) EMISSION RATE POTENTIAL LESS THAN 3 POUNDS PER HOUR (LBS/HR) INCLUDING DRUM FILLING AND DISTILLATION OPERATIONS.

Process: H03 is located at also Bldg 142, Building 120 - DISTILLING EAST OPERATIONS WITH VOLATILE ORGANIC COMPOUND (VOC) EMISSION RATE POTENTIAL GREATER THAN 3 POUNDS PER HOUR (LBS/HR) AND REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT) CONTROL, INCLUDING SOLVENT STORAGE AND DISTILLATION OPERATIONS.

Process: H04 is located at also Bldg D63, Building 120 - DISTILLING EAST DISTILLATION OPERATIONS WITH VOLATILE ORGANIC COMPOUND (VOC) EMISSION RATE POTENTIAL GREATER THAN 3 POUNDS PER HOUR (LBS/HR) AND PROCESS SPECIFIC REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT) DEMONSTRATION WITH A COMBINED CAP.

Process: H05 is located at also Bldg 115, Building 120 - DISTILLING EAST- SOLVENT STORAGE AND DISPENSING OPERATIONS WITH VOLATILE ORGANIC COMPOUND (VOC) EMISSION RATE POTENTIAL GREATER THAN 3 POUNDS PER HOUR (LBS/HR) AND PROCESS SPECIFIC REASONABLY AVAILABLE CONTROL TECHNOLOGY DEMONSTRATIONS.

Emission unit U00080 - FILM DISPERSION AND SOLUTION MAKING AREAS INCLUDING DISPENSING, MIXING, WASHING, AND STORAGE ACTIVITIES AS WELL AS INCIDENTAL FUGITIVE EMISSIONS.

Emission unit U00080 is associated with the following emission points (EP):

03039, 03054, 03055, 03057, 03062, 03078, 030K1, 030L0, 030L1, 030L4, 030M9

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

Process: P10 is located at Building 030 - AQUEOUS SOLUTION MAKING INCLUDING SOURCES WITH VOC EMISSION RATE POTENTIAL <3.0 LB/HR (ie. DISSOLUTION AND MIXING).

Process: P11 is located at Building 030 - ALCOHOL SOLUTION MAKING (ie. DISSOLUTION AND MIXING)

Process: P12 is located at Building 030 - DISPERSION MAKING INCLUDING SOURCES WITH VOC EMISSION RATE POTENTIAL <3.0 LB/HR (ie. DISSOLUTION AND MIXING).

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Process: P13 is located at Building 030 - SEVENTH FLOOR DRY MATERIAL WEIGHING

Emission unit U00008 - CHEMICAL WASTE INCINERATOR (BLDG 218 RKI), WASTEWATER TREATMENT SLUDGE INCINERATION (BLDG 95 MHI), AND BLDG 218 WASTE MANAGEMENT OPERATIONS, INCLUDING TANKS, CONTAINERS AND ASSOCIATED EQUIPMENT, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00008 is associated with the following emission points (EP):  
21801, 21802, 95-03

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

Process: K01 is located at Building 218 - LIQUID AND SOLID PACK CHEMICAL WASTE INCINERATION IN ROTARY KILN INCINERATOR

Process: K02 is located at Building 095 - WASTEWATER TREATMENT SLUDGE INCINERATION IN A MULTIPLE HEARTH INCINERATOR

Process: K19 is located at Building 218 - BUILDING 218 WASTE STORAGE TANKS VENTING THROUGH INCINERATOR.

Process: K20 is located at Building 218 - BUILDING 218 WASTE STORAGE TANKS VENTING THROUGH CARBON VAPOR PACKS WHEN B-218 CHEMICAL WASTE INCINERATOR IS (1) SHUT DOWN FOR MAINTENANCE OR (2) OPERATING OUTSIDE PERMITTED PARAMETERS.

Process: K21 is located at Building 218 - BUILDING 218 WASTE STORAGE TANKS SUBJECT TO 6 NYCRR PART 229

Emission unit U00077 - BUILDING 304 PRODUCT SOLIDIFICATION OPERATIONS. INCLUDING ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00077 is associated with the following emission points (EP):  
304A8

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

Process: I33 is located at Building 304 - PRODUCT DEWATERING

Emission unit U00006 - MISCELLANEOUS WASTE SOLVENT HANDLING, FILM BASE CLEANING AND TREATMENT DEVICES, CLEANING AND RAW MATERIAL PRE WEIGH OPERATION IN BUILDING 329, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00006 is associated with the following emission points (EP):  
329F3, 329L1, 329L7, 329M0

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

Process: C09 is located at Building 329 - WASTE (HAZ) SOLVENT AND RECOVERABLE (VOL) SOLVENT HANDLING WITH PART 212 RACT CAP OF 0.76 TPY.

Process: C10 is located at Building 329 - FILM BASE CLEANING AND TREATMENT DEVICES PROCESS EMISSION SOURCES WITH NOX EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LBS/HR ERP.

Process: C12 is located at Building 329 - PRE WEIGH OF RAW MATERIALS. OPERATIONS MAY RESULT IN INCIDENTAL INDOOR FUGITIVE EMISSIONS.

Emission unit U00054 - BUILDING 329 PHOTOGRAPHIC WEB INCLUDING COATING PREPARATION AND DELIVERY; EQUIPMENT CLEANING; COATING & DRYING OPERATIONS, AND ASSOCIATED FUGITIVE EMISSIONS

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Emission unit U00054 is associated with the following emission points (EP):  
329L9, 329M3

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

Process: C01 is located at Building 329 - FILM COATING AND DRYING WITH MACT APPLICABILITY, INCLUDING NON-ROUTINE OPERATIONS WHICH MAY RESULT IN INCIDENTAL INDOOR FUGITIVE EMISSIONS

Process: C02 is located at Building 329 - PREPARATION AND DELIVERY OF PHOTOGRAPHIC COATING SOLUTIONS WITH MACT APPLICABILITY

Process: C03 is located at Building 329 - CLEANING OF COATING SOLUTION APPLICATION EQUIPMENT WITH MACT APPLICABILITY

Process: C04 is located at Building 329 - CLEANING OF COATING SOLUTION PREPARATION AND DELIVERY EQUIPMENT WITH MACT APPLICABILITY

Process: C05 is located at Building 329 - PHOTOGRAPHIC FILM WEB COATING AND DRYING WITH ONLY PART 228 APPLICABILITY. OPERATIONS MAY RESULT IN INCIDENTAL INDOOR FUGITIVE EMISSIONS.

Process: C06 is located at Building 329 - PREPARATION AND DELIVERY OF PHOTOGRAPHIC SOLUTIONS.

Process: C07 is located at Building 329 - CLEANING OF COATING SOLUTION APPLICATION EQUIPMENT

Process: C08 is located at Building 329 - CLEANING OF COATING SOLUTION PREPARATION AND DELIVERY EQUIPMENT

Process: C11 is located at Building 329 - SOLUTION PREPARATION OPERATIONS WHEN COATING MACHINE IS NOT OPERATIONAL. SUBJECT TO PART 212 RACT CAP OF 2.85 TPY.

Process: C13 is located at Building 329 - PART 228 R & D COATING PHOTOGRAPHIC FILM WEB OPERATIONS (EXCLUDING MAGNETIC TAPE PRODUCTS)

Emission unit U00041 - TANKS ASSOCIATED WITH WASTEWATER TREATMENT OPERATIONS AND BUILDING 322 WASTE STORAGE, AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00041 is associated with the following emission points (EP):  
09107, 09511, 322A9, R1603

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

Process: K03 is located at also Bldg 218, Building 322 - STORAGE TANKS CONTAINING WASTE CHEMICALS ASSOCIATED WITH WASTE OPERATIONS

Process: K04 is located at also Bldg R16, Building 091 - STORAGE TANKS ASSOCIATED WITH WASTEWATER TREATMENT OPERATIONS

Emission unit U00005 - LAB SCALE PRECIOUS METALS MANUFACTURING OPERATIONS INCLUDING SOLIDS MILLING, SOLUTION PREPARATION, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00005 is associated with the following emission points (EP):  
08219, 08221

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

Process: H01 is located at Building 082 - PRECIOUS METALS BENCH SCALE MANUFACTURING AND RAW MATERIALS PREPARATION OPERATIONS WITH VOLATILE ORGANIC

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COMPOUNDS EMISSION RATE POTENTIAL LESS THAN 3 POUNDS PER HOUR (LBS/HR).

Emission unit U00046 - SILVER FLOW STORAGE OPERATIONS, AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00046 is associated with the following emission points (EP):  
110C0, 110C7, 110C8

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

Process: H37 is located at Building 110 - NON-VOLATILE RAW MATERIAL STORAGE TANKS ASSOCIATED WITH NITRIC ACID PRODUCTION

Emission unit U00076 - SILVER FLOW ELECTROLYTIC CELL AND TANK OPERATIONS, AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00076 is associated with the following emission points (EP):  
11002, 110B5, 110C1

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

Process: H33 is located at Building 110 - ELECTROLYTIC CELLS AND ASSOCIATED PROCESS TANKS USED IN THE RECOVERY OF SILVER WITH NOX ERP < 3 LBS/HR, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES.

Emission unit U00012 - FILM EMULSION MAKING & FINISHING AREAS INCLUDING MIXING, WASHING, AND STORAGE OPERATIONS AND EQUIPMENT WITH INCIDENTAL INDOOR FUGITIVE EMISSIONS.

Emission unit U00012 is associated with the following emission points (EP):  
03051, 03059, 030L2, 030L3, 030M5, 030M7, 030N1, 030N2, 030N4, 030N6, 030N7, 030N9, 030P1

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

Process: P20 is located at Building 030 - FILM EMULSION MAKING NORTH CONVENTIONAL (I.E. MIXING AND PRECIPITATION)

Process: P21 is located at Building 030 - FILM EMULSION MAKING SOUTH CONVENTIONAL (I.E. MIXING AND PRECIPITATION)

Process: P23 is located at Building 030 - FILM EMULSION MAKING-OTHER (I.E. MIXING AND PRECIPITATION)

Process: P24 is located at Building 030 - FILM EMULSION FINISHING FOURTH AND FIFTH FLOOR (I.E. MIXING AND HEATING)

Process: P25 is located at Building 030 - FILM EMULSION FINISHING POSITIONS 19 AND 20 (I.E. MIXING AND HEATING)

Process: P26 is located at Building 030 - CALIBRATION OF PROCESS INSTRUMENTS

Process: P27 is located at Building 030 - SMALL SCALE FILM EMULSION HEATING, MIXING & PROCESSING

Process: P28 is located at Building 030 - SILVER-RICH WATER VAULT EXHAUST

Emission unit U00032 - FINISHING OPERATIONS INCLUDING PERFORATING, SLITTING, SPOOLING, LABELING AND PACKAGING OPERATIONS WITH INCIDENTAL FUGITIVE EMISSIONS

Emission unit U00032 is associated with the following emission points (EP):  
326B3, 326B7, 326B9

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

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Process: P91 is located at Building 326 - PRODUCT ROLL SLITTING

Process: P93 is located at Building 326 - Film perforation operations

Emission unit U00028 - SILVER FLOW ASH SYSTEM AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00028 is associated with the following emission points (EP):

101A1

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

Process: H32 is located at Building 101 - SILVER CONTAINING ASH CONVEYANCE SYSTEM, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES

Emission unit U00024 - POLYESTER FILM BASE MANUFACTURING OPERATIONS INCLUDING SYNTHESIS, EXTRUSION, COATING, STORAGE AND MATERIAL HANDLING, AND ASSOCIATED FUGITIVE EMISSIONS.

THIS EMISSION UNIT PREVIOUSLY INCLUDED PROCESSES E54 AND E60. THE USE OF METHYLENE CHLORIDE AT THESE TWO PROCESSES HAS BEEN DISCONTINUED AND THE ASSOCIATED CARBON ADSORPTION SYSTEMS WERE SHUT DOWN AT THE END OF 2005. NOW USING COMPLIANT COATINGS, THESE SOURCES ARE REPRESENTED UNDER PROCESS E55. EXTENSIVE PERMIT CHANGES TO REFLECT THE CONCLUSION OF THE REFORMULATION WERE INCLUDED IN KODAK'S 4/21/06 LETTER TO DEC.

Emission unit U00024 is associated with the following emission points (EP):

31705, 31707, 31709, 317B2, 317F2, 317F3, 317F4, 317F5, 317F6, 317F7, 317F8, 317F9, 317G0, 317G1, 317G2, 317G3, 317G4, 317G5, 317G6, 317G7, 317G8, 317G9, 317H0, 317H1, 317H2, 317H3, 317H4, 317H5, 317H9, 317J1, 317J2, 317K2, 317K6, 317K9, 317L3, 317L7, 317M5, 317M6, 317M7, 317M8, 317M9, 317N1, 317N2, 317N3, 317N4, 317R3, 317R6, 317R7, 317R9, 317S0, 317S1, 317S2, 317S3, 317S4, 317T5, 317T9, 317U3, 317U4, 317U5, 317U6, 317U7, 317V5, 317V9, 317W1, 317W2, 317W3, 317W4, 317W5, 317W6, 317W7, 317W8, 317Y3, 317Y4, 317Y5, 317Y6, 317Y7, 317Y8, 317Y9, 317Z0, 317Z1, 317Z2, 317Z3, 317Z4, 317Z5, 317Z6, 317Z7, 317Z8, 317Z9, 33501, 33502

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

Process: E51 is located at also Bldg 335, Building 317 - GENERAL PROCESS EMISSION SOURCES SUBJECT TO THE 0.15 GR/DSCF STANDARD.

Process: E52 is located at Building 317 - GENERAL PROCESS EMISSION SOURCES SUBJECT TO THE 0.05 GR/DSCF STANDARD. NOTE THAT EMISSION SOURCES 317 DQ AND 317DL(INCLUDED IN THIS PROCESS) HAVE A VOC ERP < 3 LBS/HR. (I.E. WEIGHING, BLENDING & CONVEYANCE)

Process: E53 is located at Building 317 - GENERAL PROCESS EMISSION SOURCES WITHOUT PARTICULATE EMISSIONS (I.E. MIXING, CHEMICAL STORAGE & CLEANING)

Process: E55 is located at Building 317 - FILM BASE EXTRUDING AND COATING OPERATIONS USING COMPLIANT COATINGS. THIS PROCESS NOW INCLUDES REFORMULATED COATING PROCESSES WHICH WERE PREVIOUSLY ASSOCIATED WITH PROCESS E55.

Process: E56 is located at Building 317 - RESEARCH AND DEVELOPMENT EXTRUSION AND SURFACE COATING OPERATIONS EXEMPT FROM 6NYCRR PART 228.

Process: E59 is located at Building 317 - SOURCES ASSOCIATED WITH POLYETHYLENE TEREPHALATE MANUFACTURING ACTIVITIES SUBJECT TO 40 CFR 63 SUBPART JJJ (I.E.

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Process: E60 is located at N/A, Building 317 - STORAGE TANKS SUBJECT TO 6NYCRR 229

Process: E62 is located at Building 317 - FILM BASE EXTRUDING AND COATING OPERATIONS USING AN APPROVED COATING SYSTEM

Emission unit U00029 - ROCHESTER PAPER FLOW PHOTOGRAPHIC PAPER COATING OPERATIONS BUILDING 50. OPERATIONS INCLUDE MATERIAL PREPARATION, AND COATING OPERATIONS MAY RESULT IN INCIDENTAL INDOOR FUGITIVE EMISSIONS.

Emission unit U00029 is associated with the following emission points (EP):

05060, 05061, 05062, 05064, 05069, 05097, 050L0, 050M1, 050M3, 050M6, 050M8

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

Process: B50 is located at Building 050 - GENERAL PROCESS EMISSION SOURCES (INCLUDING SOLUTION PREPARATION, MIXING & PAPER TRIMMING) WITH PARTICULATE EMISSIONS ONLY.

Process: B51 is located at Building 050 - GRAVURE PRINTING WITH VOC EMISSIONS LESS THAN THE RACT THRESHOLD OF 3.0 LBS/HR ERP AND INKS WITH PART 63 SUBPART KK RECORD KEEPING ONLY.

Process: B52 is located at Building 050 - PAPER WEB COATING WITH COMPLIANT COATING

Process: B53 is located at Building 050 - CORONA DISCHARGE TREATMENT - PROCESS EMISSION SOURCES WITH NO<sub>x</sub> EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LBS/HR ERP

Process: B54 is located at Building 050 - GENERAL PROCESS EMISSION SOURCES (INCLUDING SOLUTION PREPARATION, MIXING, AND DIE CLEANING) WITH PARTICULATE AND VOC EMISSIONS.

Process: B55 is located at Building 050 - R&D PAPER COATING ACTIVITIES

Process: B56 is located at Building 050 - GENERAL PROCESS EMISSION SOURCES (INCLUDING SOLUTION PREPARATION & MIXING) WITH VOC EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LBS/HR ERP.

Emission unit U00016 - DISPERSION MANUFACTURING OPERATIONS INCLUDING SIZE REDUCTION AND SLURRY MANUFACTURING EQUIPMENT, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00016 is associated with the following emission points (EP):

035L3, 035P8, 08223, 08226, 082X2, 082X3, 082X4

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

Process: S03 is located at Building 035 - MAGNETIC TAPE MANUFACTURING SIZE REDUCTION AND DISPERSION OPERATIONS (PARTICLE MILLING)

Process: S11 is located at Building 035 - GENERAL SIZE REDUCTION AND DISPERSION OPERATIONS INCLUDING SOURCES <3.0 LB/HR VOC ERP (PARTICLE MILLING)

Emission unit U00017 - GENERAL PROCESS EMISSIONS SOURCES ASSOCIATED WITH WASTE AND WASTEWATER TREATMENT OPERATIONS INCLUDING FLY ASH DISPOSAL, TRICKLING FILTERS, DISSOLVED AIR FLOTATION, CENTRAL VAC SYSTEM AND FUGITIVE EMISSION SOURCES LOCATED AT KINGS LANDING.

Emission unit U00017 is associated with the following emission points (EP):

09103, 09104, 09105, 09106, 09504, 09508, 09601, R1601, R1602

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

Process: K05 is located at also Bldgs 212, 218, Building 095 - GENERAL PROCESS SOURCES ASSOCIATED WITH WASTE OPERATIONS INCLUDING FLY ASH DISPOSAL

Process: K06 is located at also 95, R16, 96, Building 091 - GENERAL PROCESS EMISSION SOURCES ASSOCIATED WITH WASTEWATER OPERATIONS INCLUDING TRICKLING FILTERS, DISSOLVED AIR FLOTATION AND CENTRAL VAC SYSTEM

Emission unit U00034 - MOTOR FUEL TRANSFER AND DISPENSING OPERATIONS, AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00034 is associated with the following emission points (EP):

M9501

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

Process: W03 is located at and building H42, Building M95 - GASOLINE AND DIESEL VEHICLE REFUELING

Emission unit U00031 - BUILDING 119 BATCH SYNTHETIC CHEMICALS MANUFACTURING OPERATIONS NOT SUBJECT TO BUILDING 119 VOLATILE ORGANIC COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY (VOC RACT) CAP. INCLUDING WASTE, RECOVERY, STORAGE, VACUUM AND WASTEWATER TRAP TANK VENT; DRYING AND SEPARATING OPERATIONS AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00031 is associated with the following emission points (EP):

119I5, 119KE, 119KF, 119L9, 119M6, 119X7

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

Process: I17 is located at Building 119 - CHEMICAL MANUFACTURING WASTE, RECOVERY, STORAGE OPERATIONS

Process: I18 is located at Building 119 - CHEMICAL MANUFACTURING VACUUM SYSTEM VENT

Process: I19 is located at Building 119 - WASTE WATER (TRAP TANK) VENTILATION SYSTEMS AND OPERATIONS

Process: I20 is located at Building 119 - CHEMICAL MANUFACTURING DRYING, AND SEPARATING OPERATIONS INCLUDING LOADING AND UNLOADING STATIONS WITHOUT VOLATILE ORGANIC COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY (VOC RACT) APPLICABILITY.

Emission unit FAC001 - FACILITY EMISSION UNIT FOR SOLVENT METAL PARTS CLEANERS AND ASSOCIATED FUGITIVE EMISSIONS.

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

Process: 226 is located at Building FACILITY - SOLVENT METAL CLEANING MACHINES LOCATED THROUGHOUT KODAK PARK WITH 6 NYCRR PART 226 APPLICABILITY WHICH WOULD OTHERWISE BE EXEMPT OR TRIVIAL CONSISTENT WITH PART 201-3.

Emission unit U00083 - SOURCES IN BUILDINGS 23, 65, 69, 81, 82, 135, 205, 214, 601 AND 642 ASSOCIATED WITH EQUIPMENT MANUFACTURING/ASSEMBLY AND ASSOCIATED R&D ACTIVITIES RELOCATED FROM ELMGROVE PLANT IN 2000- 2001, AND SUBJECT TO NSR CAPS. INCLUDES SOURCES WHICH (1) WERE PREVIOUSLY SUBJECT TO PERMITTING, (2) WERE PREVIOUSLY EXEMPT OR TRIVIAL, (3) ARE FUGITIVE EMISSION SOURCES.

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Emission unit U00083 is associated with the following emission points (EP):  
035R0, 03605, 08115, 08116, 08117, 08118, 20503, 20504, 20505, 20506, 20507, 20508, 20509,  
205A0, 205A1, 205A2, 205A3, 205A4, 205A5, 205A6, 205A8, 205A9, 205B0, 205B1, 205B2,  
205B3, 205B5, 205B6, 205B7, 205B8, 205B9, 205C0, 205C1, 205C2, 205C3, 214B9, 214C0, 214C1,  
214C2, 214C3

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

Process: Y07 is located at & other buildings, Building 081 - BUILDING 23, 81, 82, 135, 205, 214, 601 & 642 EMISSION POINT SOURCES ASSOCIATED WITH OPTICAL LENS MANUFACTURING, COMPONENT/EQUIPMENT MANUFACTURING & ASSEMBLY, AND RELATED R&D ACTIVITIES. INCLUDES SOURCES WHICH WERE PREVIOUSLY EXEMPT/TRIVIAL AT THE ELMGROVE FACILITY.

Process: Y08 is located at & other buildings, Building 205 - BUILDING 65, 205, 601 & 642 EMISSION POINT SOURCES ASSOCIATED WITH OPTICAL LENS MANUFACTURING, COMPONENT/EQUIPMENT MANUFACTURING & ASSEMBLY AND RELATED R&D ACTIVITIES, WITH SOLID PARTICULATE EMISSIONS. INCLUDES SOURCES WHICH WERE PREVIOUSLY EXEMPT/TRIVIAL AT THE ELMGROVE FACILITY.

Process: Y09 is located at & other buildings, Building 205 - BUILDING 65, 69, 135, 205, 214, 601 & 642 FUGITIVE EMISSION SOURCES ASSOCIATED WITH OPTICAL LENS MANUFACTURING, EQUIPMENT MANUFACTURING/ASSEMBLY AND RELATED R&D ACTIVITIES WHICH WERE PREVIOUSLY EXEMPT/TRIVIAL AT THE ELMGROVE FACILITY.

Emission unit U00078 - SILVER FLOW WATER TREATMENT OPERATIONS, AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00078 is associated with the following emission points (EP):

04690, 11004, 110B3, 110C5, 110C9, 15602

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

Process: H30 is located at also Bldg 156 & 46, Building 110 - WATER TREATMENT OPERATIONS ASSOCIATED WITH SILVER RECOVERY WITH MISCELLANEOUS FUGITIVE EMISSION SOURCES, INCLUDING OPEN BASINS, AND EMISSION SOURCES WITH VOC ERP < 3 LB/HR.

Emission unit U00009 - DISTILLING WEST MANUFACTURING OPERATIONS, INCLUDING STORAGE TANKS AND DISTILLATION EQUIPMENT, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00009 is associated with the following emission points (EP):

322B1

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

Process: H12 is located at Building 322 - DISTILLING WEST OPERATIONS WITH EMISSION CONTROL TO MEET MON MACT, RACT AND/OR BACT REQUIREMENTS, INCLUDING STORAGE TANKS AND DISTILLATION PROCESSES.

Emission unit U00001 - SILVER FLOW - COWLES WASH OPERATIONS ASSOCIATED WITH THE SILVER RECOVERY PROCESS, AND ASSOCIATED FUGITIVE EMISSIONS.

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

110C6, 110D0, 110D1, 110D2, 110D3

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

Process: H38 is located at Building 110 - FILM WASH OPERATIONS, INCLUDING

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MISCELLANEOUS FUGITIVE EMISSION SOURCES. THESE WASHERS REMOVE COATINGS & EMULSIONS FROM FILM SCRAP PRODUCTS.

Process: H43 is located at BLDG 110, Building 110 - FILM DRYING OPERATIONS EQUIPPED WITH DUST CONTROL, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES

Emission unit U00050 - POLYESTER RECOVERY VOC EMISSION SOURCES, ASSOCIATED WITH THE MANUFACTURE OF POLYETHYLENE TEREPHTHALATE (PET), INCLUDING ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00050 is associated with the following emission points (EP):  
351C8, 351D0

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

Process: H50 is located at Building 351 - MISCELLANEOUS SOURCES ASSOCIATED WITH POLYESTER RECOVERY OPERATIONS WITH VOC EMISSION RATE POTENTIAL (ERP) <3 LBS/HR (ie: STORAGE AND PROCESS TANKS).

Process: H65 is located at Building 351 - HOT OIL PROCESS HEATER OPERATING AS AN EMISSION SOURCE OF COMBUSTION BY-PRODUCTS ONLY WITH VOC EMISSION RATE POTENTIAL (ERP) <3 LBS/HR.

Emission unit U00007 - BOILERS WITH LESS THAN 20 MMBTU/HR BUT GREATER THAN 15 LB/DAY NOX EMISSIONS, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00007 is associated with the following emission points (EP):  
50201, 50202, 51406, 51407

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

Process: W01 is located at also bldgs 514 & 601, Building 502 - NATURAL GAS FIRED BOILERS LESS THAN 20 MMBTU/HOUR AND GREATER THAN 15 LB/DAY NOX

Emission unit U00075 - SENSITIZED WEB COATING OPERATIONS INCLUDING COATING MACHINES, EMULSION MAKING, MELT, DELIVERY, AND WASHING OPERATIONS AND EQUIPMENT WITH INCIDENTAL INDOOR FUGITIVE EMISSIONS

Emission unit U00075 is associated with the following emission points (EP):  
035P7, 08224

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

Process: S10 is located at Building 035 - GENERAL PROCESS EMISSION SOURCES WITH VOC EMISSION RATE POTENTIAL < 3.0 LB/HR (ie. CRYSTAL PRECIPITATION, CHEMICAL MIXING, MELTING, PUMPING & CLEANING).

Emission unit U00052 - SILVER FLOW INDUCTION FURNACE OPERATION AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00052 is associated with the following emission points (EP):  
110A1

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

Process: H34 is located at Building 110 - SILVER RECOVERY INDUCTION FURNACE OPERATIONS INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES

Emission unit U00053 - BUILDING 325 BATCH ORGANIC CHEMICAL MANUFACTURING OPERATIONS SUBJECT TO BUILDING 325 VOC RACT CAP (VOLATILE ORGANIC

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COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY). INCLUDING ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00053 is associated with the following emission points (EP):  
325X3

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

Process: I35 is located at Building 325 - BATCH ORGANIC CHEMICAL MANUFACTURING OPERATIONS WITH SOLID PARTICULATE EMISSIONS

Emission unit FAC002 - FACILITY EMISSION UNIT FOR STATIONARY COMBUSTION SOURCES WITH PART 227 APPLICABILITY AND ASSOCIATED FUGITIVE EMISSIONS.

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

Process: DSL is located at Building FACILITY - STATIONARY COMBUSTION SOURCES WHICH FIRE ONLY DIESEL FUEL LOCATED THROUGHOUT KODAK PARK WITH 6 NYCRR PART 227 APPLICABILITY WHICH WOULD OTHERWISE BE EXEMPT OR TRIVIAL CONSISTENT WITH PART 201-3.

Process: NGS is located at Building FACILITY - STATIONARY COMBUSTION SOURCES WHICH FIRE ONLY NATURAL GAS LOCATED THROUGHOUT KODAK PARK WITH 6 NYCRR PART 227 APPLICABILITY WHICH WOULD OTHERWISE BE EXEMPT OR TRIVIAL CONSISTENT WITH PART 201-3.

Emission unit U00004 - B29 MELT/COAT AREA INCLUDING WEB COATING OPERATIONS AND EQUIPMENT WITH INCIDENTAL INDOOR FUGITIVE EMISSIONS FROM COATING, IONIZING, MELTING AND STORAGE ACTIVITIES.

PROCESS P40 HAS BEEN REMOVED FROM THIS EMISSION UNIT IN MOD 2 BECAUSE IT WAS DETERMINED THAT THIS R&D PROCESS WAS NOT NECESSARY AND ITS REMOVAL SIMPLIES THE PERMIT AND RECORDKEEPING REQUIREMENTS.

Emission unit U00004 is associated with the following emission points (EP):  
029U6

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

Process: P40 is located at Building 029 - PAPER/PLASTIC WEB COATING USING PART 228 COMPLIANT COATINGS SYSTEM.

Process: P42 is located at Building 029 - PAPER/PLASTIC WEB COATING FOR PURPOSES OF RESEARCH AND DEVELOPMENT

Process: P43 is located at Building 029 - FILM ROLL UNWINDING WITH A VOC EMISSION RATE POTENTIAL <3 LBS/HR.

Emission unit U00056 - BUILDING 304 BATCH OPERATIONS NOT SUBJECT TO NORTH CHEMICALS DEPARTMENT VOC RACT (VOLATILE ORGANIC COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY) CAP, INCLUDING STORAGE TANKS, ASSOCIATED FUGITIVE EMISSIONS, AND WASTEWATER VENTILATION.

Emission unit U00056 is associated with the following emission points (EP):  
304A7, 304A9

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

Process: I31 is located at Building 304 - WASTE WATER (TRAP TANK) VENTILATION

Process: I48 is located at Building 304 - B-304 GLYCOL STORAGE TANKS

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Emission unit U00057 - WEB EXTRUSION & COATING OPERATIONS INCLUDING SOURCES OF INCIDENTAL INDOOR FUGITIVE EMISSIONS

Emission unit U00057 is associated with the following emission points (EP): 00711, 00735, 035P3, 035P6

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

Process: S04 is located at Building 035 - PILOT SCALE EXTRUSION OF PLASTIC & WEB COATING OF PLASTIC/PAPER USING PART 228 COMPLIANT COATINGS

Process: S12 is located at Building 035 - PILOT SCALE EXTRUSION OF PLASTIC & WEB COATING OF PLASTIC/PAPER FOR PURPOSES OF RESEARCH AND DEVELOPMENT

Process: S18 is located at Building 007 - WEB COATING OF PLASTIC USING PART 228 COMPLIANT COATING SYSTEM

Process: S19 is located at Building 007 - GENERAL PROCESS EMISSION SOURCE WITH VOC EMISSIONS LESS THAN 3 LB/HR (I.E. SOLUTION STORAGE AND HANDLING)

Process: S20 is located at Building 007 - GENERAL PROCESS EMISSION SOURCE WITH NO<sub>x</sub> EMISSIONS LESS THAN 3 LB/HR

Emission unit U00059 - ROCHESTER PAPER FLOW MANUFACTURING B350. INCLUDES PHOTOGRAPHIC PAPER WEB COATING, PRINTING, AND ASSOCIATED GENERAL PROCESS EMISSIONS SOURCES. OPERATIONS MAY RESULT IN INCIDENTAL INDOOR FUGITIVE EMISSIONS.

Emission unit U00059 is associated with the following emission points (EP): 35001, 35002, 35003, 35004, 35006, 35007, 35008

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

Process: B70 is located at Building 350 - GRAVURE PRINTING WITH VOC EMISSIONS LESS THAN 3.0 LBS/HR ERP AND INKS WITH PART 63 SUBPART KK RECORDKEEPING ONLY

Process: B71 is located at Building 350 - PAPER WEB COATING WITH COMPLIANT COATINGS.

Process: B72 is located at Building 350 - CORONA DISCHARGE TREATMENT PROCESS EMISSION SOURCES WITH NO<sub>x</sub> EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LBS/HR EMISSION RATE POTENTIAL

Process: B73 is located at Building 350 - GENERAL PROCESS EMISSION SOURCES INCLUDING SOLUTION PREPARATION & MIXING, AND DIE CLEANING WITH PARTICULATE EMISSIONS AND VOC EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LBS/HR ERP.

Process: B74 is located at Building 350 - R & D PAPER COATING & PRINTING OPERATIONS

Emission unit U00060 - BUILDING 301, 303 & 304 BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS INCLUDING DRYING, BLENDING, MATERIAL TRANSFER AND STORAGE, WITH PROCESSES SUBJECT TO THE BUILDING-WIDE VOC RACT CAP (VOLATILE ORGANIC COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY), INCLUDING ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00060 is associated with the following emission points (EP):

30105, 301X1, 301X2, 303A8, 303X1, 303X2, 30403, 304A0, 304B0, 304X1, 304X2

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

Process: I24 is located at also Bldg 303, Building 301 - BUILDING 301 AND 303 SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS, ORGANIC CHEMICALS MANUFACTURING OPERATIONS WITH SOLID PARTICULATE EMISSIONS.

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Process: I25 is located at Building 301 - BUILDING 301 CHEMICAL BLENDING OPERATIONS.  
Process: I26 is located at Building 303 - BUILDING 303 PILOT AREA, WITH FEDERALLY ENFORCEABLE VOC CAP. PILOT SCALE ORGANIC CHEMICAL MANUFACTURING/DEVELOPMENT OPERATIONS WITH SOLID PARTICULATE EMISSIONS.  
Process: I27 is located at Building 304 - BUILDING 304 SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS DRYING AND BLENDING OPERATION.  
Process: I28 is located at Building 304 - BUILDING 304 BATCH ORGANIC CHEMICAL MANUFACTURING OPERATIONS WITH SOLID PARTICULATE EMISSIONS.  
Process: I45 is located at Building 304 - BUILDING 304 HARDENER MANUFACTURING OPERATIONS WITH SOLID PARTICULATE EMISSIONS, AFTER SUCCESSFUL CONSTRUCTION & DEBUG OF MODIFICATIONS AS AUTHORIZED UNDER STATE FACILITY PERMIT DATED, (SEPTEMBER 19, 2000).  
Process: I49 is located at and B-303, Building 301 - B-301 and B-303 Glycol Storage Tanks

Emission unit U00002 - BUILDING 325 BATCH OPERATIONS NOT SUBJECT TO VOLATILE ORGANIC COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY (VOC RACT) CAPS. INCLUDING STORAGE TANKS, WASTE AND RECOVERY STORAGE OPERATIONS AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00002 is associated with the following emission points (EP):  
325B0, 325B3

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

Process: I37 is located at Building 325 - STORAGE TANKS CONTAINING SOLVENT WASTE MATERIALS WITH VOLATILE ORGANIC COMPOUNDS EMISSION RATE POTENTIAL LESS THAN 3 POUNDS PER HOUR (LBS/HR).

Process: I47 is located at Building 325 - B-325 GLYCOL STORAGE TANKS

Emission unit U00061 - UTILITIES SUPPLY SIDE, MISCELLANEOUS PROCESS SOURCES INCLUDING FUGITIVE EMISSIONS FROM DICHLOROMETHANE PACKING GLANDS AND PUMP SEALS.

Emission unit U00061 is associated with the following emission points (EP):  
01701

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

Process: K17 is located at Building 017 - GENERAL PROCESS EMISSIONS SOURCES (ie DESSICANT DRYING).

Emission unit U00048 - BUILDING 148 BATCH SYNTHETIC CHEMICALS MANUFACTURING, TRANSFER, AND REPACKAGING EQUIPMENT AND ASSOCIATED VENTILATION INCLUDING ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00048 is associated with the following emission points (EP):  
14806, 148X1

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

Process: I01 is located at Building 148 - BATCH SMALL SCALE ORGANIC CHEMICAL MANUFACTURING OPERATIONS WITH SOLID PARTICULATE EMISSIONS.

Process: I03 is located at Building 148 - CHEMICAL TRANSFER AND REPACKAGING OPERATIONS

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Emission unit U00063 - SILVER FLOW SMELTER AND ROASTER, AND ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00063 is associated with the following emission points (EP):  
101A2, 101A3

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

Process: H29 is located at Building 101 - SILVER RECOVERY ROASTING AND SMELTING PROCESS SUBJECT TO NOX RACT, INCLUDING MISCELLANEOUS FUGITIVE EMISSIONS SOURCES.

Emission unit U00065 - PROCESS EMISSIONS SOURCES AND OPERATIONS INCLUDING WOOD FURNITURE MANUFACTURING AND ASSOCIATED FUGITIVE EMISSIONS.

PROCESS W02 (REPAIR OF ELECTRIC MOTORS) HAS BEEN ELIMINATED FROM THIS EMISSION UNIT BECAUSE THE SOURCES HAVE BEEN SHUT DOWN.

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

Process: W05 is located at Building 328 - Incidental Wood Furniture Manufacturing subject to 40CFR63, Subpart JJ

Emission unit U00047 - B38 OPERATIONS INCLUDING WEB COATING, EMULSION FINISHING OPERATIONS AND EQUIPMENT, AND MAINTENANCE STORAGE ACTIVITIES WITH ASSOCIATED INCIDENTAL FUGITIVE EMISSIONS.

PROCESS P63 HAS BEEN REMOVED FROM THIS EMISSION UNIT IN MOD 2 BECAUSE IT WAS DETERMINED THAT THIS R&D PROCESS WAS NOT NECESSARY AND ITS REMOVAL SIMPLIES THE PERMIT AND RECORDKEEPING REQUIREMENTS

Emission unit U00047 is associated with the following emission points (EP):  
03802, 03810, 03812, 03813, 03814, 03815, 03816, 03817, 03818

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

Process: P60 is located at Building 038 - COATING SUPPORT AND MAINTENANCE OPERATIONS

Process: P61 is located at Building 038 - PLASTIC/PAPER WEB COATING USING PART 228 COMPLIANT COATINGS

Process: P63 is located at Building 038 - PLASTIC/PAPER WEB COATING FOR PURPOSES OF RESEARCH AND DEVELOPMENT

Process: P64 is located at Building 038 - PREPARATION OF COATING SOLUTIONS

Process: P65 is located at Building 038 - IONIZERS WITH <3.0 LB/HR NOX

Process: P66 is located at Building 038 - MISC. COATING SUPPORT OPERATIONS WITH <3.0 LB/HR VOC. (I.E. CORE CLEANING, HOUSE VACUUM AND SILVER-RICH WATER STORAGE)

Emission unit U00027 - PHOTOCHEMICAL MANUFACTURING OPERATIONS INCLUDING MATERIAL STORAGE, POWDER AND SOLUTION MIXING, TRANSFER, AND FILLING SOURCES, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00027 is associated with the following emission points (EP):

01801, 01804, 01808, 01827, 01829, 01834, 04818, 04821, 04841, 04843, 04845

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

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Process: H19 is located at also Bldg 049, Building 048 - RAW MATERIAL STORAGE AND HANDLING OPERATIONS WITH VOC ERP <3 LBS/HR, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES

Process: H20 is located at Building 018 - SOLUTION MIXING OPERATIONS WITH VOC ERP < 3 LBS/HR INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES

Process: H21 is located at Building 048 - SOLUTION MIXING OPERATIONS WITH VOC ERP > 3 LBS/HR AND RACT CONTROL, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES.

Process: H22 is located at also Bldg 048, Building 018 - SOLUTION FILLING OPERATIONS WITH VOC ERP < 3 LBS/HR, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES.

Process: H23 is located at also Bldg 018, Building 048 - SOLUTION FILLING OPERATIONS WITH VOC ERP > 3 LBS/HR AND RACT CONTROL, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES.

Process: H24 is located at Building 048 - POWDER FILLING OPERATIONS, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES.

Process: H25 is located at Building 018 - AGGREGATE SOLUTION AND POWDER MIXING AND FILLING OPERATIONS WITH VOC ERP >3 LBS/HR AND RACT CONTROL, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES.

Emission unit U00074 - SILVER FLOW- SILVER RICH MUD FILTERING OPERATIONS ASSOCIATED WITH THE SILVER RECOVERY OPERATIONS.

Emission unit U00074 is associated with the following emission points (EP):  
110B7

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

Process: H41 is located at Building 110 - FILTER LAB HOOD ASSOCIATED WITH SILVER RECOVERY SAMPLING & DISPOSITION FROM PHOTOGRAPHIC OPERATIONS WITH VOC EMISSION RATE POTENTIAL (ERP) < 3 LBS/HR, INCLUDING MISCELLANEOUS FUGITIVE EMISSION SOURCES

Emission unit U00062 - B29 FILM SENSITIZING SUPPORT OPERATIONS INCLUDING CORE PREP, AND VACUUM SYSTEMS.

Emission unit U00062 is associated with the following emission points (EP):  
029U9, 029V2

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

Process: P50 is located at Building 029 - FILM CORE CLEANING OPERATION WITH EMISSION RATE POTENTIAL <3.0 LB/HR VOC

Process: P52 is located at Building 029 - GRID IONIZER TEST STATION WITH NOX EMISSION RATE POTENTIAL <3 LB/HR.

Emission unit U00042 - SENISTIZED PRODUCTS QUALITY SERVICES OPERATIONS INVOLVING MANUFACTURING AND GLUING OF LIGHT ATTENUATION TABLETS USED FOR FILM AND PAPER SENSITOMETRY

Emission unit U00042 is associated with the following emission points (EP):  
00683

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

Process: F01 is located at Building 006 - MANUFACTURING AND GLUING OF LIGHT

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ATTENUATION TABLETS USED FOR FILM AND PAPER SENSITOMETRY WITH PROCESS EMISSIONS OF VOC LESS THAN 3 LBS/HR AND INCLUDING ANY ASSOCIATED FUGITIVE EMISSIONS

Emission unit U00025 - GENERAL PROCESS EMISSION SOURCES INCLUDING CHEMICAL MANUFACTURING OPERATIONS WITH INCIDENTAL FUGITIVE EMISSIONS.

Emission unit U00025 is associated with the following emission points (EP):  
30502, 30503, 30504

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

Process: S05 is located at Building 305 - CHEMICAL MANUFACTURING <3.0 LB/HR VOC ERP

**Title V/Major Source Status**

KODAK PARK DIVISION is subject to Title V requirements. This determination is based on the following information:

Kodak Park is a major facility because uncapped potential emissions for most USEPA criteria pollutants is over 250 tons per year (tpy) each and is over 10 tpy for each of many Hazardous Air Pollutants (HAPS) and over 25 tpy for total HAPS.

**Program Applicability**

The following chart summarizes the applicability of KODAK PARK DIVISION with regards to the principal air pollution regulatory programs:

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

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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
3861	PHOTOGRAPH EQUIPMENT & 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
4-04-004-97	BULK TERMINALS/PLANTS BULK TERMINALS/PLANTS FOR PETROLEUM PRODUCTS - UNDERGROUND TANKS Specify Liquid: Breathing Loss
3-01-820-02	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - WASTEWATER AGGREGATE WASTEWATER TREATMENT
3-13-065-99	ELECTRICAL EQUIPMENT ELECTRICAL EQUIPMENT - SEMICONDUCTOR MANUFACTURING SEMICONDUCTOR MFG-MISCELLANEOUS OPERATIONS-GENERAL-SPECIFY MATERIAL
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-02-006-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Less Than 10 MMBtu/Hr
1-02-004-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL

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INDUSTRIAL BOILER - RESIDUAL OIL  
<10MMBTU/HR \*\*

4-01-003-36 ORGANIC SOLVENT EVAPORATION  
COLD SOLVENT CLEANING/STRIPPING  
Entire Unit

4-01-002-15 ORGANIC SOLVENT EVAPORATION  
ORGANIC SOLVENT EVAPORATION - DEGREASING  
ENTIRE UNIT - OPEN-TOP VAPOR DEGREASING

3-15-010-02 PHOTOGRAPHIC EQUIPMENT  
PHOTOCOPYING EQUIPMENT MANUFACTURING  
Toner Classification

3-16-040-01 PHOTOGRAPHIC PRODUCT MANUFACTURING  
CHEMICAL MANUFACTURING  
CHEMICAL MANUFACTURING

3-16-040-03 PHOTOGRAPHIC PRODUCT MANUFACTURING  
CHEMICAL MANUFACTURING  
CHEMICAL MIXING OPERATIONS

3-16-040-02 PHOTOGRAPHIC PRODUCT MANUFACTURING  
CHEMICAL MANUFACTURING  
ELMUSION MAKING OPERATION

3-16-120-02 PHOTOGRAPHIC PRODUCT MANUFACTURING  
CLEANING OPERATIONS  
GENERAL CLEANING OPERATIONS

3-16-120-03 PHOTOGRAPHIC PRODUCT MANUFACTURING  
CLEANING OPERATIONS  
PARTS CLEANING OPERATION

3-16-120-01 PHOTOGRAPHIC PRODUCT MANUFACTURING  
CLEANING OPERATIONS  
TANK CLEANING OPERATIONS

3-16-060-02 PHOTOGRAPHIC PRODUCT MANUFACTURING  
FINISHING OPERATIONS  
CUTTIN/SLITTING OPERATIONS

3-16-030-01 PHOTOGRAPHIC PRODUCT MANUFACTURING  
MANUFACTURING  
EXTRUSION OPERATIONS

3-16-030-02 PHOTOGRAPHIC PRODUCT MANUFACTURING  
MANUFACTURING  
FILM SUPPORT OPERATIONS

3-16-160-06 PHOTOGRAPHIC PRODUCT MANUFACTURING  
OTHER OPERATIONS  
CHEMICAL WEIGHING OPERATIONS

3-16-160-02 PHOTOGRAPHIC PRODUCT MANUFACTURING  
OTHER OPERATIONS  
GENERAL PROCESS TANK OPERATIONS

3-16-160-03 PHOTOGRAPHIC PRODUCT MANUFACTURING  
OTHER OPERATIONS  
MISCELLANEOUS MANUFACTURING - OPERATIONS

3-16-160-04 PHOTOGRAPHIC PRODUCT MANUFACTURING  
OTHER OPERATIONS  
PAINT SPRAYING OPERATIONS

3-16-150-03 PHOTOGRAPHIC PRODUCT MANUFACTURING  
RECOVERY OPERATIONS  
DISTILLATION OPERATIONS

3-16-150-04 PHOTOGRAPHIC PRODUCT MANUFACTURING  
RECOVERY OPERATIONS  
FILTRATION OPERATIONS

3-16-150-01 PHOTOGRAPHIC PRODUCT MANUFACTURING  
RECOVERY OPERATIONS  
RECOVERY OPERATIONS

3-16-130-02 PHOTOGRAPHIC PRODUCT MANUFACTURING  
STORAGE OPERATIONS  
GENERAL STORAGE OPERATIONS

3-16-130-01 PHOTOGRAPHIC PRODUCT MANUFACTURING

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STORAGE OPERATIONS  
SOLVENT STORAGE OPERATIONS  
3-16-130-04 PHOTOGRAPHIC PRODUCT MANUFACTURING  
STORAGE OPERATIONS  
3-16-050-03 WASTE STORAGE - SPECIFY WASTE IN COMMENTS  
PHOTOGRAPHIC PRODUCT MANUFACTURING  
SURFACE TREATMENTS  
CORONA DISCHARGE TREATMENT  
3-16-050-02 PHOTOGRAPHIC PRODUCT MANUFACTURING  
SURFACE TREATMENTS  
GRID IONZERS  
3-16-050-04 PHOTOGRAPHIC PRODUCT MANUFACTURING  
SURFACE TREATMENTS  
PHOTOGRAPHIC DRYING OPERATIONS`  
3-16-050-01 PHOTOGRAPHIC PRODUCT MANUFACTURING  
SURFACE TREATMENTS  
SURFACE COATING OPERATIONS  
3-16-140-01 PHOTOGRAPHIC PRODUCT MANUFACTURING  
TRANSFER OPERATIONS  
3-16-140-02 FILLING OPERATIONS (NONPETROLEUM) SPECIFY PRODUCT  
PHOTOGRAPHIC PRODUCT MANUFACTURING  
TRANSFER OPERATIONS  
4-05-005-97 TRANSFER OF CHEMICALS - SPECIFY PRODUCT  
PRINTING/PUBLISHING  
PRINTING/PUBLISHING - GENERAL  
OTHER NOT CLASSIFIED  
4-05-003-11 PRINTING/PUBLISHING  
PRINTING/PUBLISHING - GENERAL  
PRINTING - FLOXOGRAPHIC  
4-05-008-01 PRINTING/PUBLISHING  
PRINTING/PUBLISHING - GENERAL  
PRINTING/PUBLISHING GENERAL-SCREEN PRINTING  
5-03-005-01 SOLID WASTE DISPOSAL - INDUSTRIAL  
SOLID WASTE DISPOSAL: INDUSTRIAL - INCINERATION  
Hazardous Waste  
5-03-005-06 SOLID WASTE DISPOSAL - INDUSTRIAL  
SOLID WASTE DISPOSAL: INDUSTRIAL - INCINERATION  
Sludge  
5-03-007-02 SOLID WASTE DISPOSAL - INDUSTRIAL  
SOLID WASTE DISPOSAL: INDUSTRIAL - LIQUID WASTE  
SOLID WASTE DISPOSAL-INDUSTRIAL-LIQUID WASTE  
TREATMENT-GENERAL  
5-03-008-99 SOLID WASTE DISPOSAL - INDUSTRIAL  
SOLID WASTE DISPOSAL: INDUSTRIAL - TREATMENT, STORAGE,  
DISPOSAL /TSDF  
GENERAL:FUGITIVE EMISSIONS  
4-02-007-01 SURFACE COATING OPERATIONS  
SURFACE COATING APPLICATION - GENERAL  
Adhesive Application  
4-02-013-01 SURFACE COATING OPERATIONS  
SURFACE COATING OPERATIONS - PAPER COATING  
Coating Operation  
4-02-013-99 SURFACE COATING OPERATIONS  
SURFACE COATING OPERATIONS - PAPER COATING  
Other Not Classified  
4-02-019-01 SURFACE COATING OPERATIONS  
SURFACE COATING OPERATIONS - WOOD FURNITURE SURFACE  
COATING  
Coating Operation

Facility Emissions Summary

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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 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
000092-52-4	1, 1 BIPHENYL (HAP)	>= 10	tpy
000079-34-5	1, 1, 2, 2-TETRACHLOROETHANE (HAP)	>= 10	tpy
000057-14-7	1, 1-DIMETHYL HYDRAZINE (HAP)	>= 10	tpy
000120-82-1	1, 2, 4-TRICHLOROENZENE (HAP)	>= 10	tpy
000084-74-2	1, 2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER (HAP)	>= 10	tpy
000120-80-9	1, 2-BENZENEDIOL (HAP)	>= 10	tpy
000107-06-2	1, 2-DICHLOROETHANE (HAP)	>= 10	tpy
000107-21-1	1, 2-ETHANEDIOL (HAP)	>= 10	tpy
000108-38-3	1, 3 DIMETHYL BENZENE (HAP)	>= 10	tpy
000095-80-7	1, 3-BENZENEDIAMINE, 4-METHYL- (HAP)	>= 10	tpy
000106-99-0	1, 3-BUTADIENE (HAP)	>= 10	tpy
000126-99-8	1, 3-BUTADIENE, 2-CHLORO- (HAP)	>= 10	tpy
000497-26-7	1, 3-DIOXOLANE, 2-METHYL-C4H8O2	>= 250	tpy
000085-44-9	1, 3-ISOBENZOFURANDIONE (HAP)	>= 10	tpy
000123-31-9	1, 4-BENZENEDIOL (HAP)	>= 10	tpy
000123-91-1	1, 4-DIETHYLENE DIOXIDE (HAP)	>= 10	tpy
000063-25-2	1-NAPHTHALENOL, METHYLCARBAMATE (HAP)	>= 10	tpy
000098-86-2	1-PHENYLETHANONE (HAP)	>= 10	tpy
000542-75-6	1-PROPENE, 1, 3-DICHLORO- (HAP)	>= 10	tpy
001746-01-6	2, 3, 7, 8-TETRACHLORODIBENZO-P-DIOXIN (HAP)	>= 10	tpy
000563-79-1	2, 3-DIMETHYL-2-BUTENE	>= 250	tpy
000121-14-2	2, 4, DINITRO TOLUENE (HAP)	>= 10	tpy
000051-28-5	2, 4, DINITROPHENOL (HAP)	>= 10	tpy
000088-06-2	2, 4, 6 TRICHLOROPHENOL (HAP)	>= 10	tpy
000094-75-7	2, 4-DICHLOROPHENOXYACETIC ACID (HAP)	>= 10	tpy



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000108-31-6	2,5 - FURANDIONE (HAP)	>= 10	tpy
000053-96-3	2-ACETYLAMINOFLUORENE (HAP)	>= 10	tpy
000078-59-1	2-CYCLOHEXEN-1-ONE, 3,5,5-TRIME THYL (HAP)	>= 10	tpy
000109-86-4	2-METHOXYETHANOL (HAP)	>= 10	tpy
000095-48-7	2-METHYL-PHENOL (HAP)	>= 10	tpy
000107-87-9	2-PENTANONE	>= 250	tpy
000108-10-1	2-PENTANONE, 4-METHYL (HAP)	>= 10	tpy
000075-31-0	2-PROPANAMINE	>= 250	tpy
000079-10-7	2-PROPENOIC ACID (HAP)	>= 10	tpy
000141-32-2	2-PROPENOIC ACID, BUTYL ESTER C7H12O2	>= 2.5	tpy but < 10 tpy
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER (HAP)	>= 10	tpy
000096-33-3	2-PROPENOIC ACID, METHYL ESTER (9CI)	>= 250	tpy
000091-94-1	3,3'-DICHLOROBENZIDINE (HAP)	>= 10	tpy
000119-90-4	3,3'-DIMETHOXYBENZIDINE (HAP)	>= 10	tpy
000107-05-1	3-CHLORO-1-PROPENE (HAP)	>= 10	tpy
000101-77-9	4,4'-DIAMINODIPHENYLMETHANE (HA P)	>= 10	tpy
000101-14-4	4,4-METHYLENE BIS (2-CHLOROANILINE) (HAP)	>= 10	tpy
ONY502-00-0	40 CFR 60-63 - TOTAL ORGANIC COMPOUNDS (TOC)	>= 250	tpy
000060-11-7	4-DIMETHYLAMINOAZOBENZENE (HAP)	>= 10	tpy
000123-42-2	4-HYDROXY-4-METHYL-2-PENTANONE	>= 250	tpy
000075-07-0	ACETALDEHYDE (HAP)	>= 10	tpy
000060-35-5	ACETAMIDE (HAP)	>= 10	tpy
000064-19-7	ACETIC ACID	>= 50	tpy but < 100 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER (HAP)	>= 10	tpy
000109-60-4	ACETIC ACID PROPYL ESTER	>= 250	tpy
000079-11-8	ACETIC ACID, CHLORO (HAP)	>= 10	tpy
000079-20-9	ACETIC ACID, METHYL ESTER	>= 250	tpy
000075-05-8	ACETONITRILE (HAP)	>= 10	tpy
000075-36-5	ACETYL CHLORIDE	>= 250	tpy
000107-02-8	ACROLEIN (HAP)	>= 10	tpy
000532-27-4	ALPHA-CHLOROACETOPHENONE (HAP)	>= 10	tpy
007664-41-7	AMMONIA	>= 250	tpy
000062-53-3	ANILINE (HAP)	>= 10	tpy
007440-36-0	ANTIMONY (HAP)	>= 10	tpy
007440-38-2	ARSENIC (HAP)	>= 10	tpy
000075-55-8	AZIRIDINE, 2-METHYL (HAP)	>= 10	tpy
007440-39-3	BARIUM	>= 250	tpy
000114-26-1	BAYGON (HAP)	>= 10	tpy
000090-04-0	BENZENAMINE, 2-METHOXY (HAP)	>= 10	tpy
000095-53-4	BENZENAMINE, 2-METHYL (HAP)	>= 10	tpy
000121-69-7	BENZENAMINE, N, N-DIMETHYL (HAP)	>= 10	tpy
000071-43-2	BENZENE (HAP)	>= 10	tpy
000098-82-8	BENZENE, (1-METHYLETHYL) (HAP)	>= 10	tpy
000072-55-9	BENZENE, 1,1'-(DIC HLOROETHE NYLIDENE) BIS [4-CHLORO- (HAP)	>= 10	tpy
000106-46-7	BENZENE, 1,4-DICHLORO- (HAP)	>= 10	tpy
000584-84-9	BENZENE, 2,4-DIISO CYANATO-1-METHYL- (HAP)	>= 10	tpy
001321-74-0	BENZENE, DIETHENYL-	>= 250	tpy
000098-07-7	BENZENE, TRICHLOROMETHYL (HAP)	>= 10	tpy
000095-47-6	BENZENE, 1,2-DIMETHYL (HAP)	>= 10	tpy
000100-44-7	BENZYL CHLORIDE (HAP)	>= 10	tpy



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007440-41-7	BERYLLIUM (HAP)	>= 10 tpy
000057-57-8	BETA-PROPIOLACTONE (HAP)	>= 10 tpy
000117-81-7	BIS (2-ETHYLHEXYL) PHTHALATE (HAP)	>= 10 tpy
007726-95-6	BROMINE	> 0 but < 2.5 tpy
000075-25-2	BROMOFORM (HAP)	>= 10 tpy
000109-74-0	BUTANENITRILE C <sub>4</sub> H <sub>7</sub> N	>= 2.5 tpy but < 10 tpy
000105-45-3	BUTANOIC ACID, 3-OXO-, METHYL ESTER	>= 250 tpy
000071-36-3	BUTANOL	>= 10 tpy but < 25 tpy
007440-43-9	CADMIUM (HAP)	>= 10 tpy
007440-70-2	CALCIUM	>= 250 tpy
000133-06-2	CAPTAN (HAP)	>= 10 tpy
000051-79-6	CARBAMIC ACID, ETHY ESTER (HAP)	>= 10 tpy
000079-44-7	CARBAMIC CHLORIDE, DIMETHYL (HAP)	>= 10 tpy
000075-15-0	CARBON DISULFIDE (HAP)	>= 10 tpy
000630-08-0	CARBON MONOXIDE	>= 250 tpy
000056-23-5	CARBON TETRACHLORIDE (HAP)	>= 10 tpy
000463-58-1	CARBONYL SULFIDE (HAP)	>= 10 tpy
000133-90-4	CHLORAMBEN (HAP)	>= 10 tpy
000057-74-9	CHLORDANE (HAP)	>= 10 tpy
007782-50-5	CHLORINE (HAP)	>= 10 tpy
000108-90-7	CHLOROBENZENE (HAP)	>= 10 tpy
000067-66-3	CHLOROPFORM (HAP)	>= 10 tpy
007440-47-3	CHROMIUM (HAP)	>= 10 tpy
018540-29-9	CHROMIUM (VI) (HAP)	> 0 but < 10 tpy
007440-48-4	COBALT (HAP)	>= 10 tpy
007440-50-8	COPPER	>= 250 tpy
001319-77-3	CRESYLIC ACID (HAP)	>= 10 tpy
000156-62-7	CYANAMIDE, CALCIUM SALT (1:1) (HAP)	>= 10 tpy
000057-12-5	CYANIDE (HAP)	>= 10 tpy
000110-82-7	CYCLOHEXANE	>= 250 tpy
000334-88-3	DIAZOMETHANE (HAP)	>= 10 tpy
000132-64-9	DIBENZOFURAN (HAP)	>= 10 tpy
000075-09-2	DICHLOROMETHANE (HAP)	>= 10 tpy
000096-22-0	DIETHYL KETONE	> 0 but < 2.5 tpy
000131-11-3	DIMETHYL PHTHALATE (HAP)	>= 10 tpy
000067-64-1	DIMETHYL KETONE	>= 250 tpy
000646-06-0	DIOXACYCLOPENTANE, 1, 3- (C <sub>3</sub> H <sub>6</sub> O <sub>2</sub> )	> 0 but < 2.5 tpy
000075-04-7	ETHANAMINE	>= 250 tpy
000109-89-7	ETHANAMINE, N-ETHYL	> 0 but < 2.5 tpy
000071-55-6	ETHANE, 1, 1, 1-TRICHLORO (HAP)	>= 10 tpy
000079-00-5	ETHANE, 1, 1, 2-TRICHLORO (HAP)	>= 10 tpy
000075-34-3	ETHANE, 1, 1-DICHLORO- (HAP)	>= 10 tpy
000111-44-4	ETHANE, 1, 1'-OXYBIS 2-CHLORO (HAP)	>= 10 tpy
000106-93-4	ETHANE, 1, 2-DIBROMO (HAP)	>= 10 tpy
000075-00-3	ETHANE, CHLORO (HAP)	>= 10 tpy
025154-53-4	ETHANE, DIMETHOXY	>= 250 tpy
000067-72-1	ETHANE, HEXACHLORO (HAP)	>= 10 tpy
000540-67-0	ETHANE, METHOXY-	>= 250 tpy
000111-42-2	ETHANOL, 2, 2'-IMINOBI- (HAP)	>= 10 tpy
000075-35-4	ETHENE, 1, 1-DICHLORO (HAP)	>= 10 tpy
000510-15-6	ETHYL 4, 4'-DICHLOROBENZILATE (HAP)	>= 10 tpy
000141-78-6	ETHYL ACETATE	>= 250 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)	>= 250 tpy
000106-88-7	ETHYL OXIRANE (HAP)	>= 10 tpy
000100-41-4	ETHYLBENZENE (HAP)	>= 10 tpy
000079-06-1	ETHYLENE CARBOXAMIDE (HAP)	>= 10 tpy

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000075-21-8	ETHYLENE OXIDE (HAP)	>= 10 tpy
000096-45-7	ETHYLENE THIOUREA (HAP)	>= 10 tpy
000151-56-4	ETHYLENEIMINE (HAP)	>= 10 tpy
016984-48-8	FLUORIDE	>= 250 tpy
000050-00-0	FORMALDEHYDE (HAP)	>= 10 tpy
000068-12-2	FORMAMIDE, N,N-DIMETHYL (HAP)	>= 10 tpy
008006-61-9	GASOLINE	>= 250 tpy
0NY100-00-0	HAP	>= 250 tpy
000076-44-8	HEPTACHLOR (HAP)	>= 10 tpy
000118-74-1	HEXACHLORO BENZENE (HAP)	>= 10 tpy
000087-68-3	HEXACHLOROBUTADIENE (HAP)	>= 10 tpy
000077-47-4	HEXACHLOROCYCLOPENTADIENE (HAP)	>= 10 tpy
000110-54-3	HEXANE (HAP)	>= 10 tpy
000822-06-0	HEXANE, 1,6-DIISOCYANATO- (HAP)	>= 10 tpy
000302-01-2	HYDRAZINE (HAP)	>= 10 tpy
007647-01-0	HYDROGEN CHLORIDE (HAP)	>= 10 tpy
007664-39-3	HYDROGEN FLUORIDE (HAP)	>= 10 tpy
007783-06-4	HYDROGEN SULFIDE	>= 250 tpy
007553-56-2	IODINE	>= 250 tpy
000078-83-1	ISOBUTYL ALCOHOL	>= 250 tpy
000078-84-2	ISOBUTYRIC ALDEHYDE	> 0 but < 2.5 tpy
000108-21-4	ISOPROPYL ACETATE	>= 250 tpy
000067-63-0	ISOPROPYL ALCOHOL	>= 250 tpy
000108-20-3	ISOPROPYL ETHER	>= 2.5 tpy but < 10 tpy
007439-92-1	LEAD (HAP)	>= 10 tpy
000058-89-9	LINDANE, GAMMA (HAP)	>= 10 tpy
007439-96-5	MANGANESE (HAP)	>= 10 tpy
007439-97-6	MERCURY (HAP)	>= 10 tpy
000062-75-9	METHANAMINE, N-METHYL-N-NITROSO (HAP)	>= 10 tpy
000074-82-8	METHANE	>= 250 tpy
000067-68-5	METHANE , SULFINYLBIS C2H6OS	> 0 but < 2.5 tpy
000542-88-1	METHANE, OXYBIS (CHLORO) (HAP)	>= 10 tpy
000072-43-5	METHOXYCHLOR (HAP)	>= 10 tpy
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER (HAP)	>= 10 tpy
000067-56-1	METHYL ALCOHOL (HAP)	>= 10 tpy
000074-89-5	METHYL AMINE	>= 2.5 tpy but < 10 tpy
000074-83-9	METHYL BROMIDE (HAP)	>= 10 tpy
000074-87-3	METHYL CHLORIDE (HAP)	>= 10 tpy
000107-30-2	METHYL CHLOROMETHYLETHER (HAP)	>= 10 tpy
000078-93-3	METHYL ETHYL KETONE (HAP)	>= 10 tpy
000060-34-4	METHYL HYDRAZINE (HAP)	>= 10 tpy
000074-88-4	METHYL IODIDE (HAP)	>= 10 tpy
000624-83-9	METHYL ISOCYANATE (HAP)	>= 10 tpy
001634-04-4	METHYL TERTBUTYL ETHER (HAP)	>= 10 tpy
000101-68-8	METHYLENE BISPHENYL ISOCYANATE (HAP)	>= 10 tpy
000121-44-8	N,N-DIETHYL ETHANAMINE (HAP)	>= 10 tpy
000091-20-3	NAPHTHALENE (HAP)	>= 10 tpy
000544-16-1	N-BUTYL NITRATE	> 0 but < 2.5 tpy
000142-82-5	N-HEPTANE	>= 250 tpy
0NY059-28-0	NICKEL (NI 059) (HAP)	>= 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS (HAP)	>= 10 tpy
000098-95-3	NITROBENZENE (HAP)	>= 10 tpy
000059-89-2	NITROSOMORPHOLINE (HAP)	>= 10 tpy
000684-93-5	NITROSO-N-METHYLUREA (HAP)	>= 10 tpy
000119-93-7	O-TOLIDINE (HAP)	>= 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy
000106-89-8	OXIRANE, (CHLOROMETHYL) (HAP)	>= 10 tpy
000092-67-1	P-AMINODIPHENYL (HAP)	>= 10 tpy
000100-02-7	PARA-NITROPHENOL (HAP)	>= 10 tpy

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0NY075-00-0	PARTICULATES	>= 250 tpy
000082-68-8	PENTACHLORONITROBENZENE (HAP)	>= 10 tpy
000540-84-1	PENTANE, 2,2,4-TRIMETHYL- (HAP)	>= 10 tpy
000127-18-4	PERCHLOROETHYLENE (HAP)	>= 10 tpy
000108-95-2	PHENOL (HAP)	>= 10 tpy
000534-52-1	PHENOL, 2-METHYL-4,6-DINITRO (HAP)	>= 10 tpy
000108-39-4	PHENOL, 3-METHYL (HAP)	>= 10 tpy
000106-44-5	PHENOL, 4-METHYL (HAP)	>= 10 tpy
000087-86-5	PHENOL, PENTACHLORO (HAP)	>= 10 tpy
000075-44-5	PHOSGENE (HAP)	>= 10 tpy
007803-51-2	PHOSPHINE (HAP)	>= 10 tpy
000062-73-7	PHOSPHORIC ACID, 2,2-DICHLOROETHENYL DIMETHYL ESTER (HAP)	>= 10 tpy
000680-31-9	PHOSPHORIC TRIAMIDE, HEXAMETHYL (HAP)	>= 10 tpy
000056-38-2	PHOSPHOROTHIOIC ACID, O,O-DIETHYL O- (4-NITROPHENYL) ESTER (HAP)	>= 10 tpy
007723-14-0	PHOSPHORUS (YELLOW) (HAP)	>= 10 tpy
010025-87-3	PHOSPHORUS OXYCHLORIDE	>= 250 tpy
0NY075-00-5	PM-10	>= 250 tpy
001336-36-3	POLYCHLORINATED BIPHENYL (HAP)	>= 10 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS (HAP)	>= 10 tpy
007440-09-7	POTASSIUM K	>= 250 tpy
000106-50-3	P-PHENYLENEDIAMINE (HAP)	>= 10 tpy
001120-71-4	PROPANE SULTONE (HAP)	>= 10 tpy
000096-12-8	PROPANE, 1,2-DIBROMO-3-CHLORO (HAP)	>= 10 tpy
000078-87-5	PROPANE, 1,2-DICHLORO (HAP)	>= 10 tpy
000075-56-9	PROPANE, 1,2-EPOXY- (HAP)	>= 10 tpy
000079-46-9	PROPANE, 2-NITRO (HAP)	>= 10 tpy
000071-23-8	PROPANOL	>= 250 tpy
000107-13-1	PROPENENITRILE (HAP)	>= 10 tpy
000123-38-6	PROPIONALDEHYDE (HAP)	>= 10 tpy
000110-86-1	PYRIDINE	>= 10 tpy but < 25 tpy
000091-22-5	QUINOLINE (HAP)	>= 10 tpy
000106-51-4	QUINONE (HAP)	>= 10 tpy
0NY220-86-0	RADON (RN 220)	>= 10 tpy but < 25 tpy
007782-49-2	SELENIUM (HAP)	>= 10 tpy
007440-23-5	SODIUM	>= 250 tpy
000100-42-5	STYRENE (HAP)	>= 10 tpy
000096-09-3	STYRENE OXIDE (HAP)	>= 10 tpy
007704-34-9	SULFUR	>= 250 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy
000064-67-5	SULFURIC ACID, DIETHYL ESTER (HAP)	>= 10 tpy
000077-78-1	SULFURIC ACID, DIMETHYL ESTER (HAP)	>= 10 tpy
007791-25-5	SULFURYL CHLORIDE	> 0 but < 2.5 tpy
000109-99-9	TETRAHYDROFURAN	>= 250 tpy
007719-09-7	THIONYL CHLORIDE	> 0 but < 2.5 tpy
007550-45-0	TITANIUM TETRACHLORIDE (HAP)	>= 10 tpy
000108-88-3	TOLUENE (HAP)	>= 10 tpy
008001-35-2	TOXAPHENE (HAP)	>= 10 tpy
000079-01-6	TRICHLOROETHYLENE (HAP)	>= 10 tpy
000095-95-4	TRICHLOROPHENOL, 2,4,5 (HAP)	>= 10 tpy
001582-09-8	TRIFLURALIN (HAP)	>= 10 tpy
000593-60-2	VINYL BROMIDE (HAP)	>= 10 tpy
000075-01-4	VINYL CHLORIDE (HAP)	>= 10 tpy
0NY998-00-0	VOC	>= 250 tpy

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001330-20-7	XYLENE, M, O & P MIXT. (HAP)	>= 10 tpy
000106-42-3	XYLENE, PARA- (HAP)	>= 10 tpy
007440-66-6	ZINC	>= 250 tpy

**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 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

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shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

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

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

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

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

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

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

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

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

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

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

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

If any provisions, parts or conditions of this permit are found to be

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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

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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

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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 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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>	<b>Condition</b>
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	2-402, 981
U-00008/-/K01	ECL 19-0304	Powers and Duties - burning of hazardous waste	2-407
U-00008/21801	40CFR 52-A.21	Prevention of Significant Deterioration	107, 108
U-00024	40CFR 52-A.21	Prevention of Significant	2-152

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**Applicability Discussion:**

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

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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 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

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

6NYCRR 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.

6NYCRR 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.

6NYCRR 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.

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

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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 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.

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 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.

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

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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.

#### 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, KODAK PARK DIVISION has been determined to be subject to the following regulations:

#### 40CFR 52-A.21

This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions; ie: facilities that are located in an attainment area and that emit pollutants which are listed in

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40 CFR 52.21(b)(23)(i) .

40CFR 60-A

This regulation contains the General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements

40CFR 60-Dc.48c (g)

The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

40CFR 60-Dc.48c (i)

This regulation requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

40CFR 60-Kb.112b (a) (3)

This regulation requires owner or operators of storage vessels with the dimensions listed below, to install a closed vent system and control device to collect all volatile organic compounds that are discharged from the vessel. This requirement applies to storage vessels with the following dimensions: design capacity > 151 m<sup>3</sup> containing a VOL that, as stored, has a maximum true vapor pressure > 5.2 kPa but < 76.6 kPa or with a design capacity > 75 m<sup>3</sup> but < 151 m<sup>3</sup> containing a VOL that, as stored, has a maximum true vapor pressure > 27.6 kPa but less than 76.7 kPa. The emissions from the storage vessel must be monitored and be less than 500 parts per million.

40CFR 60-Kb.112b (a) (3) (ii)

This regulation requires that the control device for the closed vent system be designed and operated to reduce the inlet volatile organic compound emissions by 95%.

40CFR 60-Kb.113b (c)

This regulation allows the owner or operator of the storage vessel equipped with a closed vent system and control device to be exempt from the requirements of 40 CFR 60.8 (General Provisions). The source owner or operator must provide documentation that the control device will achieve the required control efficiency during maximum loading conditions.

40CFR 60-Kb.115b (c)

This regulation requires the owner or operator to keep records of the operating plan and record the measured values of the parameters monitored for the closed vent system.

40CFR 60-Kb.116b (a)

This is the records retention requirement for all records required by this section.

40CFR 60-SSS.712 (d) (2)

This regulation requires the owner or operator of equipment used for coating mix operation to install a cover that meets the following criteria:

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1. Is closed at all times, except when adding ingredients, withdrawing samples, transferring the contents or making visual inspections.
2. Must extend at least 2 centimeters beyond the outer rim of the opening and must be attached to the rim
3. Be in contact with the entire perimeter of the rim
4. Any opening in the cover must be covered when not actively in use
5. A polyethylene or nonpermanent cover may be used if it meets the requirements cited above.

40CFR 60-SSS.713 (b) (8)

This regulation requires the owner or operator of standard mix equipment to prove, during inspection of the equipment, that the covers on the equipment have been properly installed and are being used correctly and that procedures, detailing the proper use of the covers, are posted in the area where the equipment is located.

40CFR 61-A

This regulation, 40 CFR 61 Subpart A, lists the general provisions that a facility subject to a National Emissions Standard for Hazardous Air Pollutant is subject to.

40CFR 61-E.52 (b)

This regulation sets the standard for mercury emissions from sludge incineration plants and/or sludge drying plants that process wastewater treatment plant sludges. The emission standard is less than 3,200 grams of mercury per day.

40CFR 61-E.54 (e)

This regulation forbids any changes to the operation of a sludge processing operation that would result in an increase in emissions, until this amount of the increase has been calculated and reported to the EPA.

40CFR 61-E.55 (a)

This regulation requires an annual emissions test for mercury if the emissions exceed 1,600 grams per 24 hour period.

40CFR 61-FF.342 (a)

Conditions under this rule outline the requirements for chemical manufacturing plants, coke byproduct recovery plants and petroleum refineries to show that they manage less than 10 megagrams per year of benzene from facility waste. Staying below this threshold exempts the plant from the substantive requirements of the Benzene Recovery NESHAP. The Kodak Park facility is exempt because the permit caps the facility below the threshold.

40CFR 61-FF.356 (a)

This regulation requires the owner or operator to comply with the recordkeeping requirements of 40 CFR 61.356. Each record must be maintained in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified

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40CFR 61-FF.356 (b) (1)

This regulation requires the owner or operator to maintain records that identify each waste stream at the facility subject to 40 CFR 61 Subpart FF, and indicate whether or not the waste stream is controlled for benzene emissions in accordance with this subpart.

40CFR 61-FF.357 (a)

This regulation requires each owner or operator of a chemical plant, petroleum refinery, coke by-product recovery plant, and any facility managing wastes from these industries to submit to the EPA a report that summarizes the regulatory status of each waste stream subject to Sec. 61.342 and is determined by the procedures specified in 40 CFR 61.355(c) to contain benzene.

40CFR 61-FF.357 (b)

If the total annual benzene quantity from the facility is less than 1 Mg/yr, this regulation requires the owner or operator to submit to the DEC and/or EPA a report that updates the information listed in paragraphs (a)(1) through (a)(3) of 40 CFR 61.357 whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr or more.

40CFR 61-M

This rule specifies NESHAP requirements for controlling asbestos emissions. Kodak's on-going building demolition projects may be applicable to this federal rule.

40CFR 63-BBBBB

Requirements under 40 CFR 63 Subpart BBBBB are applicable to Kodak's semiconductor manufacturing sources within Emission Unit U-00020. Kodak has been granted a one year extension of the final compliance date in accordance with the requirements of 40 CFR 63.6(i). The extension is necessary to allow time for the unexpected installation of emission controls under Subpart BBBBB. Kodak recognized the need for an extension around mid-November when EPA provided an interpretation of the rule applicability which differs substantially from Kodak's prior understanding, based on extended discussions with EPA during the rule development. Kodak is currently in discussions with EPA's Office of Air Quality Planning & Standards to resolve the applicability question. In the case that relief is not provided by EPA, Kodak shall install the required HAP emission controls by May 22, 2007, one year after the original compliance date. This permit includes a condition which specifies the schedule for installation of controls for the affected sources.

40CFR 63-DD.680 (f)

Facilities that are subject to Subpart DD are also subject to some of the general provisions listed in Subpart A of 40 CFR Part 63. This regulation lists these provisions.

40CFR 63-DD.683 (b) (2) (ii)

This regulation requires the owner or operator of the facility to limit the concentration of volatile organic hazardous air pollutants (VOHAP) to 500 parts per million for each off-site waste stream placed in a unit with a process vent. The VOHAP concentration must be determined the first time the waste is placed in the unit and then annually thereafter.

40CFR 63-DD.688

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This regulation sets forth the requirements for control of air emissions from containers used for off-site waste streams. The control requirements are specified in 40 CFR 63 Subpart PP: National Emissions Standards for Containers.

40CFR 63-DD.691

This regulation requires the owner or operator to control the hazardous air pollutants emitted from equipment leaks in accordance with the applicable provisions of 40CFR61.242 through 40CFR61.247 in subpart V - National Emission Standards for Equipment Leaks

40CFR 63-EE.701

This condition specifies record keeping requirements for the exemption for Subpart EE MACT requirements

40CFR 63-EE.701 (d)

This condition describes the date on which an existing affected source must be in compliance with the rule, depending upon whether controls are required.

40CFR 63-EE.701 (g)

This condition states that requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices found in 40 CFR 63 Subpart A must also be met. Almost all of the General Provisions apply as written in Subpart A, including schedules for notifications, testing, monitoring and reporting. Some differences from the General Provisions are noted in the table regarding operation during startup and shutdown, visible emissions. Also, since continuous opacity monitoring systems are not required, the reporting and recordkeeping provisions associated with them do not apply.

40CFR 63-EE.703 (c) (1)

This condition describes the control efficiency requirements for Hazardous Air Pollutants.

40CFR 63-EE.703 (c) (4) (i)

This condition describes the requirements for limiting HAPs using the option of an overall control efficiency from all coating operations.

40CFR 63-EE.703 (d) (2)

This condition describes the opacity requirements for emissions from particulate HAP transfer operations.

40CFR 63-EE.703 (e) (2)

This regulation sets the standard for emissions of HAPs from wash sinks for cleaning removable parts. The owner or operators may meet the standard by venting the location where the sink is located, as long as the HAP control efficiency is at least 88%.

40CFR 63-EE.703 (f) (2)

This regulation sets the standard for emissions of HAPs from equipment for flushing fixed lines. The owner or operators may meet the standard by venting the location where the lines are located, as long as the HAP control efficiency is at least 95%.

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40CFR 63-EE.704

This condition describes the operating parameters for monitoring and procedures that must be followed to demonstrate compliance with previously stated control requirements.

40CFR 63-EE.704 (b) (6)

This condition describes the requirements for establishing an operating parameter to be monitored for compliance of the capture efficiency for solvent HAP emissions which are vented through a room, enclosure or hood and the connected control device.

40CFR 63-EE.704 (b) (7)

This condition describes the requirements for establishing an operating parameter value for each baghouse or fabric filter used to control particulate HAP which is to be monitored for compliance.

40CFR 63-EE.704 (c) (10) (iii)

This condition describes the requirements for monitoring bypass valves to assure that they remain in the off position and function properly.

For any applicable vent system that contains bypass lines (not including equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes) that could potentially divert a vent stream away from the control device used to comply with §63.703 (c)(1), (c)(2), (c)(3), (c)(4), (e)(1)(i), (f)(1)(i), or (i), the permittee shall ensure that any such bypass line is in the closed position through continuous monitoring of valve position. The monitoring system shall be inspected at least once every month to ensure that it is functioning properly.

40CFR 63-EE.704 (c) (2) (ii)

This condition describes the requirements for temperature monitoring equipment.

40CFR 63-EE.704 (c) (2) (iii)

This condition describes monitoring for multiple emission points with a common control device.

40CFR 63-EE.706 (g)

This condition requires that records shall be maintained to support the outlet VOC or HAP concentration value or the carbon replacement time if a nonregenerative carbon adsorber is being used.

40CFR 63-EE.707 (i) (1)

This condition describes the requirements for submittal of excess emissions and continuous monitoring system performance reports and summary reports.

40CFR 63-EE.707 (i) (4)

This condition describes the requirements for submittal of excess emissions and continuous monitoring system performance reports and summary reports

40CFR 63-EEE

Conditions under §63.EEE incorporate by reference the General Provisions of 40 CFR 63 Subpart A that apply to Subpart EEE affected sources.

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40CFR 63-EEE.1203

This regulation sets forth the emissions requirements for hazardous waste incinerators. The limit for dioxins and furans is 0.20 nanograms Toxicity Equivalent Quotient per dry standard cubic meter (dscm). The limit for mercury is 130 micrograms/dscm. The limit for lead is 240 grams/dscm. The limit for arsenic, beryllium and chromium is 97 grams/dscm. The limit for carbon monoxide is 100 parts per million. The limit for hydrocarbons is 10 parts per million. The limit for hydrochloric acid and chlorine gas is 77 parts per million.

40CFR 63-EEE.1207

Summary of the performance testing requirements:

- (a) General.
- (b) Types of performance tests
- (c) Initial comprehensive performance test
- (d) Frequency of testing.
- (e) Notification of performance test and CMS performance evaluation, and approval of test plan and CMS performance evaluation plan.
- (f) Content of performance test plan.
- (g) Operating conditions during testing.
- (h) Operating conditions during subsequent testing.
- (i) Time extension for subsequent performance tests.
- (j) Notification of Compliance
- (k) Failure to submit a timely notification of compliance.
- (l) Failure of performance test
- (m) Waiver of Performance Test
- (n) Feedrate limits for nondetectable constituents.

40CFR 63-EEE.1211

This regulation details the types of reports that must be submitted to the Department by the owners or operators of hazardous waste incinerators.

40CFR 63-JJ.800 (a)

This provision specifies whether the facility is subject to 40CFR63, Subpart JJ for Wood Furniture Manufacturing Operations. If the facility has any wood furniture manufacturing process and is at a plant site that is a major source of hazardous air pollutants, the facility is subject to this rule. However, if the facility's primary products are something other than wood furniture and uses a small amount of finishing material or adhesives in their wood furniture manufacturing, the facility can simply keep usage records proving their small solvent usage and can avoid the requirements of this rule.

40CFR 63-KK.829 (f)

This regulation requires a printing or publishing operation to record the mass of each material applied each month at presses that are being excluded from Subpart KK because the inks, coatings etc. applied at

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the flexographic and rotogravure stations account for less than 5% of the total coatings, inks, etc. applied on the whole machine. The exemption mostly applies to surface coating and laminating machines that perform "incidental" printing.

40CFR 63-MMMM

This citation specifies requirements of the Surface Coating of Miscellaneous Metal Parts and Products NESHAP.

40CFR 63-PP.926 (a)

Subpart PP, National Emission Standards for Containers, in 40CFR63 regulates hazardous air pollutant emissions from portable containers at facilities that are subject to another federal regulation that refers to Subpart PP (for example Subpart DD, Offsite Waste and Recovery Operations). Section 63.926 specifies inspection and monitoring requirements

40CFR 63-PPPP.4510 (b)

This citation specifies the initial notification requirements for the Surface Coating of Plastic Parts and Products NESHAP.

40CFR 63-T.460 (b)

This reference states that degreaser units subject to Subpart T must meet the appropriate general requirements listed in Subpart A.

40CFR 63-T.462 (a) (2)

This paragraph states that a tight fitting cover and a freeboard ratio of at least 0.75 must be used to minimize solvent loss unless complying with paragraph (a)(1) of this section.

40CFR 63-T.462 (c)

This reference is the heading for the operating practice requirements for remote reservoir degreasers and cold cleaning machines complying with paragraph (a)(2) of this section.

40CFR 63-T.462 (d)

This regulation requires the owner or operator of a batch cold cleaning machine to submit an initial notification report (i.e., whenever the unit begins operation) as described in 40 CFR 63.468(a) and (b) and a compliance report (i.e., an emission test report) as described in 40 CFR 63.468(c)

40CFR 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.

6NYCRR 200 .3

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

6NYCRR 201-6.5 (c)

This requirement specifies what information must be included in any records and reports that are to be maintained or submitted as a result of any compliance monitoring. Records of all monitoring data and

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support information is to be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Reports of any required monitoring as a result of a federally applicable requirement needs to be submitted every 6 months, at a minimum. Finally, the permit needs to include a notification and reporting process for permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5 (c) (2)

This requirement specifies what information must be included in any records and reports that are to be maintained or submitted as a result of any compliance monitoring. Records of all monitoring data and support information is to be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Reports of any required monitoring as a result of a federally applicable requirement needs to be submitted every 6 months, at a minimum. Finally, the permit needs to include a notification and reporting process for permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 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 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 201-6.5 (f) (1)

This regulation defines, in general terms, the operational flexibility provisions associated with alternate operating scenarios. Alternate operating scenarios refer to a range of operating conditions which are defined in the permit and which allow the source the flexibility to make specified changes without requiring a permit revision. These changes cannot violate any applicable requirement and must be tracked and recorded in a log at the source.

6NYCRR 207

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

6NYCRR 212.10 (c) (3)

Acceptable NOx RACT compliance plans submitted to the Department will become part of the State SIP.

6NYCRR 212.10 (c) (4) (i)

VOC removal efficiency greater than 81% is considered RACT.

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6NYCRR 212 .10 (c) (4) (iii)

This rule allows those sources which cannot achieve an overall removal efficiency of 81% or use coatings that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the department.

6NYCRR 212 .10 (f)

Owners and/or operators must submit a RACT compliance plan with each application for a permit to construct and implement this plan when operation commences. A RACT analysis may not be required if emission levels fall below certain limits.

6NYCRR 212 .3 (b)

This rule requires existing sources (in operation on or before 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 0.15 grains per dry standard cubic foot.

6NYCRR 212 .4 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6NYCRR 212 .4 (b)

212.4(b) establishes a limit on gas and liquid particulates.

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 .5 (d)

This section specifies that if best available control technologies are implemented the commissioner may specify, under certain situations, a less restrictive emission rate.

6NYCRR 212 .5 (e)

If a process emission source meets certain other requirements the source is considered as having met the requirements of this Part. More details are provided in the regulation.

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 226

This regulation specifies the general requirements, equipment specifications and operating requirements

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for open-top vapor, conveyorized and cold cleaning degreasers.

6NYCRR 226 .5

This section of the regulation allows for a process specific RACT (Reasonably Available Control Technology) determination to be the basis for emission limits and compliance demonstration for sources which cannot comply with the control requirements otherwise specified in the rule.

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 227-2.4 (d)

This rule specifies that the reasonably available control technology (RACT) requirement for small boilers (< or = 50 million BTUs/hr) at Title V facilities consists of an annual tune-up.

6NYCRR 227-2.4 (g)

This subdivision is meant to require RACT on a significant combustion source which has no RACT provisions. This includes those units which have been "exempted." Rather than treat a significant source that falls below the size cutoffs of other subdivisions in this section as requiring no control, if the unit emits over 3 lb/hr uncontrolled or more than 15 lb./day.

As an example, a 300 hp internal combustion engines which is uncontrolled is exempt from needing a permit upstate. However, this unit emits about 7 lb/hr. This unit is a significant source of NOx and should therefore have RACT applied.

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 .1 (e) (13)

This citation specifies record keeping requirements for an exemption from Part 228 requirements for low-use, specialty-type surface coatings.

6NYCRR 228 .10

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

6NYCRR 228 .3 (a)

This reference provides the three options that can be used to control VOC emissions from a surface coating process. The three options are to use a compliant coating (i.e., one that does not exceed the allowable VOC content), the use of a coating system, or the use of air pollution control equipment.

6NYCRR 228 .3 (a)

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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 (b)

An afterburner used to control VOC emissions from a surface coating process must be able to achieve, and maintain, at least an 80 % VOC removal efficiency.

6NYCRR 228 .3 (c)

This citation specifies the minimum overall removal efficiency for an air cleaning device used for VOC control as 85% or as determined by Equation 2 found at this citation.

6NYCRR 228 .3 (d)

This citation requires an owner or operator of a coating line which utilizes a coating system as a control strategy (which may also employ a control device) to comply with specified requirements for computing efficiency and for Department approval.

6NYCRR 228 .3 (e)

This citation allows owners and operators of surface coating processes to operate with a lesser degree of control than required by 6 NYCRR Part 228.3 provided that a process specific reasonably available control technology (RACT) demonstration has been made to the satisfaction of the Department. Such process specific RACT demonstrations must be submitted to the administrator for approval as a revision to the State Implementation Plan and must address the technical and economic feasibility of complying with the applicable regulations.

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 .4

This reference requires the opacity of the emissions from a facility, with surface coating processes subject to this rule, to be less than 20 % during any consecutive six minute period. Opacity limits are used primarily to control the quantity of particulates released from a source.

6NYCRR 228 .5 (a)

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

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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 (c)

This reference allows the use of alternative analytical methods for determining the volatile content, water content, density, volume of solids, and weight of solids of the surface coatings, with the Department's approval, if the analytical methods in 40 CFR 60, Appendix A, Method 24 are not appropriate.

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 (d)

This reference requires facilities to allow Department staff to enter the facility in order to take coating samples during reasonable business hours.

6NYCRR 228 .5 (g)

This reference provides a list of parameters that must be continuously monitored, and periodically calibrated, at all times that an air cleaning device is operating.

6NYCRR 228 .5 (g) (3)

This requires continuous monitors measure the breakthrough of volatile organic compounds on a carbon absorption unit.

6NYCRR 228 .6 (a)

This citation exempts specific coatings (or under specific conditions) from the prohibition of sale or specification.

6NYCRR 228 .6 (a)

This reference prohibits a person from selling, specifying, or requiring the use of any coating at a facility, with a coating line described in Table 1 or 2, if the use of the coating is prohibited by any provision in this rule. However, this prohibition does not apply to coating lines with control equipment capable of meeting the allowable VOC emission limits, a compliant coating system, or a coating line which has been granted a variance.

6NYCRR 228 .6 (b)

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This requires any person selling a coating for use in a coating line subject to Part 228 to, upon request, provide the user with certification of the VOC content of the coating supplied.

6NYCRR 228 .6 (b)

This reference requires a salesperson to provide a certification to each user upon request, which indicates the VOC content of the purchased coating that is used in a coating line.

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 229 .3 (e) (2) (iv)

This section requires a tank with submerged fill for storage of volatile organic liquids

6NYCRR 229 .3 (e) (2) (v)

This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6NYCRR 229 .5 (d)

This section requires facilities subject to the requirements under Part 229.3, to maintain a record of the capacity of the volatile organic liquid storage tanks, in gallons, for a period of 5 years.

6NYCRR 230 .2 (a) (1)

This provision requires the gasoline storage tank to be equipped with vapory recovery equipment between the tank and truck.

6NYCRR 230 .2 (f)

Owners and/or operators of gasoline storage tanks, vehicles, and dispensing stations required to install stage 1 and/or stage 2 vapor recovery equipment must meet these provisions. The provisions include training , correct operation, replacement, and repair of personnel and equipment.

6NYCRR 230 .5 (a)

This section requires record keeping of delivered fuel which must be maintained for two years.

6NYCRR 230 .5 (b)

This provision determines applicability for section 230.2 based on the previous 12 month fuel delivery

6NYCRR 230 .7 (d)

This regulation requires gasoline dispensing sites to obtain a permit from the NYSDEC.

6NYCRR 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition,

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particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

6NYCRR 231-2.12

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

6NYCRR 234 .1 (h)

The use of certain types of ink is not subject to the requirements of Part 234.

6NYCRR 234 .3 (c)

The maximum concentration of volatile organic compounds (VOCs), minus water and excluded VOCs, of inks/coatings or adhesives used in applicable screen printing processes is 3.3 pounds/gallon.

6NYCRR 234 .3 (e)

The emissions to the outdoor atmosphere may not exceed an average opacity greater than 10% for any consecutive six-minute period from any emission source subject to Part 234.

6NYCRR 234 .4 (b) (4)

The facility must supply the DEC with the results of any analysis or procedure used for establishing compliance with the requirements of Part 234. These results must be submitted semi-annually at a minimum. In addition, representatives of the DEC may obtain samples of inks or fountain solutions during normal business hours in order to determine whether the facility is in compliance with the requirements of Part 234.

6NYCRR 234 .5 (a)

It is prohibited to sell, specify, or require for use a non-compliant ink or coating unless a process-specific variance from the requirements of Part 234 has been granted by the DEC or where control equipment is used to comply with the requirements of Part 234.

6NYCRR 234 .5 (b)

Any person selling a coating or ink for use at a printing process subject to 6NYCRR Part 234 must, upon request, provide the user with certification of the volatile organic compound content of the coating or ink supplied.

6NYCRR 234 .6

This requirement pertains to general provisions for the handling, storage and disposal of volatile organic compounds and applies to open containers except where production, sampling, maintenance or inspection procedures require operation access; and to actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

ECL 19-0301

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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.

ECL 19-0304

This part of the Environmental Conservation Law specifies the general requirements to be met by any person who applies for a permit to burn hazardous waste. The law requires such persons to submit and comply with an approved trial burn plan, conduct all necessary monitoring to ensure compliance with department rules and regulation and allow for the inspection by department representatives.

**Compliance Certification**

Summary of monitoring activities at KODAK PARK DIVISION:

<b>Location Facility/EU/EP/Process/ES</b>	<b>Type of Monitoring</b>	<b>Cond No.</b>
U-00008/-/K01	record keeping/maintenance procedures	2-407
U-00008/21801	record keeping/maintenance procedures	107
U-00008/21801	record keeping/maintenance procedures	108
U-00024	record keeping/maintenance procedures	2-152
U-00045/08212	record keeping/maintenance procedures	502
U-00047/03818	record keeping/maintenance procedures	513
U-00054	record keeping/maintenance procedures	2-242
U-00054	record keeping/maintenance procedures	634
U-00054/329L9	record keeping/maintenance procedures	690
U-00060/303A8/I26	record keeping/maintenance procedures	764
U-00060/303X2/I26	record keeping/maintenance procedures	768
U-00060/30403/I27	record keeping/maintenance procedures	770
U-00060/304B0/I45	record keeping/maintenance procedures	773
U-00060/304B0/I45	record keeping/maintenance procedures	774
U-00083	record keeping/maintenance procedures	2-356
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U-00084	record keeping/maintenance procedures	965
U-00085	record keeping/maintenance procedures	2-366
U-00050/-/H65/351AP	record keeping/maintenance procedures	559
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U-00008/-/K19	monitoring of process or control device parameters as surrogate	84
U-00008/-/K19	monitoring of process or control device parameters as surrogate	85
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U-00008/-/K20	monitoring of process or control device parameters as surrogate	91
U-00008/-/K19	record keeping/maintenance procedures	2-51
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U-00008/-/K02	intermittent emission testing	80
U-00008/-/K02	intermittent emission testing	82
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FACILITY	record keeping/maintenance procedures	21
FACILITY	record keeping/maintenance procedures	22
FACILITY	record keeping/maintenance procedures	23
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U-00016/-/S03	record keeping/maintenance procedures	2-117
U-00054	record keeping/maintenance procedures	2-243
U-00016/-/S03	record keeping/maintenance procedures	2-118



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U-00054/329L9/C01	monitoring of process or control device parameters as surrogate	694
U-00016/-/S03	intermittent emission testing	2-119
U-00054/329L9/C03	monitoring of process or control device parameters as surrogate	696
U-00054/329L9/C04	monitoring of process or control device parameters as surrogate	697
U-00054/-/C01	record keeping/maintenance procedures	2-246
U-00054/-/C02	record keeping/maintenance procedures	2-247
U-00054/-/C03	record keeping/maintenance procedures	2-249
U-00054/-/C04	record keeping/maintenance procedures	2-250
U-00016/-/S03/03504	monitoring of process or control device parameters as surrogate	252
U-00016/-/S03/03515	monitoring of process or control device parameters as surrogate	253
U-00054/-/C01	monitoring of process or control device parameters as surrogate	645
U-00054/-/C02	monitoring of process or control device parameters as surrogate	656
U-00054/-/C03	monitoring of process or control device parameters as surrogate	667
U-00054/-/C04	monitoring of process or control device parameters as surrogate	677
U-00054/-/C01	record keeping/maintenance procedures	643
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U-00016/-/S03	record keeping/maintenance procedures	2-120
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U-00029	record keeping/maintenance procedures	2-187
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U-00011/053L8/E06	record keeping/maintenance procedures	2-79
U-00012/030N1/P24/030AW	record keeping/maintenance procedures	2-108
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U-00024/-/E53	record keeping/maintenance procedures	2-155
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**Basis for Monitoring**

**DESCRIPTION OF MONITORING REQUIREMENTS**

**Environmental Conservation Law**

**ECL 19-304**

Special condition limits emissions of specific contaminants from the hazardous waste incinerator by establishing annual limits on materials fed to the incinerator.

**6 NYCRR Part 201 Permits and Registrations**

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

Requires submittal of semi-annual reports for deviations of monitoring conditions in the permit. Establishes procedures for prompt notification of permit deviations.

**6NYCRR Part 201-6.5(e)**

Requires submittal and specifies content of annual compliance certification reports.

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#### **6NYCRR Part 201-6.5(f)**

This facility-specific condition makes provisions for facilitating "off permit changes" authorized by the Clean Air Act section 502(b)(10) and 40 CFR 70.2. It allows changes to occur at a facility that are not specifically addressed or prohibited by the permit only after they go through a review protocol outlined in the condition. Any federal or state requirements which apply to the change must already exist in the issued Title V permit. Once the appropriate review is completed, the change may be made without making a formal permit revision or modification.

Operational flexibility may not be applied to projects that are defined as "major" under New York State Uniform Procedures (6NYCRR Part 621) or any project that would be considered a "significant permit modification" under 6NYCRR Part 201-6. This prohibition specifically includes modifications under Title I of the Clean Air Act and any change that would exceed the emissions allowable under the permit, whether expressed as a rate or in terms of total emissions.

This facility-specific condition specifies the detailed prohibitions and notification requirements associated with "off-permit" changes which are generally described in the mandatory facility-level condition under 6 NYCRR 201-6.5(f)(6). As the mandatory condition states, "off-permit changes" made pursuant to the Operational Flexibility Plan are not covered by the permit shield described in section 6NYCRR 201-6.6.

#### **6 NYCRR Part 201-6.5(f)(1)**

Kodak operates a variety of Emission Sources which are permitted under more than one operating scenario. These operating scenarios are defined by Processes within Emission Units, where multiple Processes share the same equipment, but operate the shared equipment in different ways or in a manner that triggers different applicable requirements. Specifically, these Emission Sources include, but are not limited to:

- 1) Surface coating equipment subject to 6 NYCRR Part 228 that complies using any combination of compliant coatings, an approved coating system, emission control device(s) achieving at least 85% control, a process specific RACT determination, the Part 228 exemption for Research and Development processes, and/or the Part 228 exemption for low-use surface coatings used for intermittent or specialty-type operations;
- 2) Surface coating equipment subject to 40 CFR Part 63 MACT requirements only when coating specific products;
- 3) Equipment used for solvent metal cleaning where the solvent may contain no VOCs, may contain VOCs and be subject to the requirements of 6 NYCRR Part 226, and/or may contain halogenated solvents and be subject to the requirements of 40 CFR Part 63, Subpart T;
- 4) Screen printing equipment subject to 6 NYCRR Part 234 that complies using any combination of compliant coatings, emission control device(s) achieving at least 80% control, the Part 234 exemption for conductive inks, and/or the Part 234 exemption for low-use specialty inks; and
- 5) Waste tanks associated with the B218 Rotary Kiln Incinerator that vent to a backup emission control device when the incinerator is not operating.

Contemporaneously with making a change from one operating scenario to another, Kodak shall record the scenarios in a log in the operating area or retain appropriate time stamped operating records that indicate which

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scenario is in operation. Records shall be kept on site for five years and made available to the Department upon request.

**6NYCRR Part 202-2 Emission Statements**

**6NYCRR Part 202-2.1**

Sets annual mission statement reporting deadline.

**6NYCRR Part 211 General Prohibitions**

**6NYCRR Part 211.2**

Establishes procedures for odor compliant investigation and response for Kodak's Waste water treatment plant (EU U-00017). Requires tracking and reporting of odor complaints.

**6NYCRR Part 212 General Process Emission Sources**

**6NYCRR Part 212.3(b)**

Sets process particulate emission standard for older emission sources (ie: any process emission source for which an application for a permit to construct is received by the Department on or before July 1, 1973) and allows the Department discretion to require testing to demonstrate compliance.

**6NYCRR Part 212.4(a)**

Requires monitoring of control equipment and/or process parameters and record keeping to monitor emissions of regulated toxic contaminants.

Sets control requirements for regulated contaminants.

Requires Best Available Control Technology (BACT) to limit emissions of regulated contaminants.

Special conditions set emission limits and control requirements for the Bldg 218 Rotary Kiln Incinerator and the Bldg 95 Multiple Hearth Incinerator.

Pursuant to Order on Consent R8-20020322-15, Kodak has committed to implementing a strategy for controlling emissions from the B317 Fluidized Polymerization Reactors (FPRs) and Pellet Dryers 1 and 2. The strategy includes the adoption of work practices that contribute to a reduction of acetaldehyde emissions, use of pellet feedstock containing reduced levels of acetaldehyde, and utilization of process verification tools. Implementation of the strategy shall constitute BACT (Best Available Control Technology) for the affected sources. The monitoring condition for Process E53 creates new BACT requirement for Emission Points 31705, 31707, 31709, and 317W5, which were not previously subject to 6 NYCRR 212.4(a). The monitoring condition for Process E52 (EP 317W3) replaces the BACT condition that previously existed for EP 317W3.

**6NYCRR Part 212.4(b)**

Requires monitoring of the multiple hearth incinerator (EU U-00008) and emission control equipment operating parameters to demonstrate compliance with particulate emission limits.

**6NYCRR Part 212.4(c)**

The regulation of particulate at 6 NYCRR Part 212.4(c) does not specify periodic monitoring. Therefore, the permit must contain periodic monitoring to demonstrate compliance with the 0.05 grains/dscf limit.

Many of the permit conditions included for this purpose require monitoring of control equipment and/or process parameters and/or periodic maintenance and record keeping to indicate mandated control of particulate

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emissions. For example, the pressure drop across a dry particulate filter (baghouse, HEPA filter, etc...) is a common monitoring method used to ensure that the filter is intact and providing the collection efficiency as designed. Kodak also uses "bag break detectors" to monitor particulate collection. For certain applications these particle detectors are a more precise way of monitoring compliance. The permit specifies monitoring compliance using "bag break detectors" for toner manufacturing sources in Bldg 349 (EU U00087) and at Silver Recovery (EU U00063). For sources with bag break detectors in EU U00087, the 0.05 grains/dscf particulate limit is provided in units of ug/m<sup>3</sup>, as it's read by the monitoring instrument. Particulate monitoring requirements may also include periodic replacement of dry filter elements to maintain emission control efficiency and stack testing as required by the Department to demonstrate compliance with particulate emission standards.

Many particulate sources subject to Part 212.4(c) do not need a control device to comply with the 0.05 grains/dscf particulate standard. For example, small scale mixing and pouring operations typically have very low particulate emission rates. In these cases, process knowledge, operating conditions, emission sampling data and calculations, and other information from the permit file are used to assess and demonstrate on-going compliance. For such sources, the permit requires that on a semiannual basis, Kodak review all of the data and operating parameters related to the particulate emission rate (ex. production rate, raw material supply, air flow etc..) to verify the accuracy of the reported particulate emission rate. Additionally, the permit condition requires that they investigate and correct any instance where there is cause to believe that particulate emissions above 0.05 grains/dscf are occurring or have occurred. If there is still a doubt as to whether the standard is being met, the Department may require a particulate stack test at any time.

#### **6NYCRR Part 212.6(a)**

The regulation of opacity (visible emissions) at 6 NYCRR Part 212.6(a) does not specify periodic monitoring. Therefore, the permit must contain periodic monitoring to demonstrate compliance with the 20% opacity limit. Generally, all Part 212 applicable sources at which have the potential to emit particulate emissions are subject to this opacity limit. Opacity in excess of 20% may indicate a particulate control problem but there is not always a correlation between mass emissions and opacity. Compliance with the particulate standards themselves are regulated separately under Part 212.4(b), 212.4(c) and other Federal standards.

For some emission sources where opacity has historically been a more common problem (ie: boilers and other combustion sources) opacity monitoring devices may be required either by regulation or through the permit. In this case, the permit condition would require on-going or continuous compliance demonstration through the direct measurement of opacity in the stack.

A greater number of particulate emission sources do not warrant continuous opacity monitors. Some, due to their very small potential emissions or their minimal operating time, typically have negligible or very short term (less than six minutes) opacity (a small scale pouring operation, for example). Others may have the potential to emit significant particulate emissions, but due to the high level of particulate controls required by the permit are highly unlikely to exceed the opacity standard except during a process upset. A process upset which causes opacity above the standard is likely to be accompanied by alarms and process shut-down. An example of this is the Bldg 218 hazardous waste incinerator (EU U-00008, EP 21801). The incinerator meets all the stringent requirements under the Hazardous Waste Combustor MACT (40 CFR 63 Subpart EEE) and is not required to have an opacity monitor. Generally, for these sources which do not have continuous opacity monitors the permit requires a visible observation on a semi-annual frequency. The permit condition also requires that any instance where there is cause to believe that visible emissions have the potential to exceed the standard must be

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investigated and followed-up with EPA Method 9 assessment if not corrected within one operating day. If there is still a doubt as to whether the standard is being met, the Department may conduct, or require, a Method 9 assessment for compliance at any time.

#### **6NYCRR Part 212.10(c)**

Special condition contains RACT compliance schedule to satisfy enforcement order.

#### **6NYCRR Part 212.10(c)(3)**

Sets Reasonably Available Control Technology (RACT) limits for oxides of nitrogen (NO<sub>x</sub>) emissions and requires monitoring and record keeping to demonstrate compliance.

#### **6NYCRR Part 212.10(c)(4)(i)**

Requires demonstration of compliance with RACT limits for volatile organic compounds (VOCs).

#### **6NYCRR Part 212.10(c)(4)(iii)**

Permit conditions establish RACT (Reasonably Available Control Technology) limits for volatile organic compounds (VOCs), monitoring and record keeping of process parameters or process material quantities to demonstrate compliance and on-going reevaluation of RACT. In cases where control equipment is used to meet RACT limits, permit conditions specify parametric monitoring requirements to ensure continuous compliance.

Batch synthetic chemical manufacturing operations at Kodak, including Emission Units U-00053, U-00060 and U-00079) have VOC RACT limits (12-month rolling total) specified in permit conditions. For these operations, series of reactor vessels are used to make many different chemical products. In order to demonstrate compliance with the limits, monitoring conditions require that Kodak keep production records and calculate the VOC emissions on a monthly basis. Typically, monthly emission calculations of a rolling 12-month total is a sufficient monitoring requirement for a VOC RACT limit. However, in this case, the complexity of the calculations and numerous assumptions necessary warrant additional monitoring strategies. For the purpose of assuring the accuracy of the calculations, the permit conditions requires that every 24 months emissions sampling is conducted on a representative reactor system the results of which can then be compared to the calculated emissions for that system. This is not intended as the primary monitoring requirement- but rather a Q/A check. In addition, the permit requires that monthly leak checks be performed on centrifuges and pipe-in-trench systems; quarterly leak checks be performed on the reactors and rotary dryers, and purge rates of the reactor inertion systems be checked quarterly. This combination of monitoring requirements make up a conservative approach for compliance assurance for these sources.

Emission Unit U-00024 includes monitoring conditions for Processes E52 and E53 pursuant to Order on Consent R8-20020322-15. Kodak has committed to implementing a strategy for controlling emissions from the B317 Fluidized Polymerization Reactors (FPRs) and Pellet Dryers 1 and 2. The strategy includes the adoption of work practices that contribute to a reduction of VOC (Volatile Organic Compound) emissions, use of pellet feedstock containing reduced levels of acetaldehyde, and utilization of process verification tools. Implementation of the strategy shall constitute RACT (Reasonably Available Control Technology) for the affected sources. The VOC RACT monitoring condition for Process E53 replaces conditions that previously existed for Emission Points 31705, 31707, 31709, and 317W5. The VOC RACT condition for Process E52 creates a new RACT requirement for Emission Point 317W3, which was not previously subject to 6 NYCRR 212.10(c)(4)(iii).

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#### **6NYCRR Part 212.10(f)**

Requires RACT limits for VOCs and NOx and monitoring of process parameters, process material quantities or work practices to demonstrate compliance.

An alternative monitoring method, as allowed under 212.11(b)(3), has been approved for the carbon absorption control system (Control Device 09601) on the Grit Chamber (ES 096AA) in EU U00017, Process K06. Rather than installing a continuous monitoring system to measure the concentration of volatile organic compounds at the outlet of the control system, a regular interval for changing the carbon has been established based on extensive emissions monitoring done at the time the system was installed. For additional protection against potential break-through of contaminants, two carbon canisters are used in series such that one is always providing back-up control. In addition, Kodak is required to maintain the inlet air flow within an acceptable range to operate the carbon control system. DEC approved this alternative monitoring method because it provides equal, if not better, protection than an outlet monitor prescribed in the regulation.

#### **6NYCRR Part 226 Solvent Metal Cleaning Processes**

These conditions establish equipment specifications, operating requirements, and work practice standards for conveyORIZED degreasers and cold cleaning degreasers. These work practice requirements must be adhered to on a continuous basis whenever the sources are in use. The proper operating procedures must be posted conspicuously. By their nature, these requirements do not lend themselves to parametric monitoring or regular frequency of inspection. The original Title V permit included a requirement for a daily inspection of subject cleaners, but after further review and consideration, it was determined that daily inspections would be impractical since these sources may not be used on a daily basis. Less frequent inspections (ex. weekly) would not significantly improve compliance with these types of requirements. It was determined that a single monitoring approach would not work for all of the sources subject to these requirements because of the variety of types, sizes and operating frequencies of the degreasers.

Some of the cleaners subject to these requirements are small and may be considered "insignificant activities" (ie. cleaners that would be eligible for an exemption from permitting under Part 201 if not for their applicability to Part 226 or 40 CFR 63 Subpart T). Specifically, Part 201-3.2(c)(39) provides an exemption from permitting for solvent metal cleaners which meet certain size and solvent criteria. The cold cleaners in this category include those identified in the permit as EU FAC001 and EU U-00040/Process J09. For the purpose of demonstrating compliance at these smaller degreasers, the permit conditions revised in Mod 2 of the Title V specify that the operator must note any deviations from the requirements in the log book.

For those cleaners which do not meet the size criteria of the Part 201 exemption, the permit conditions include more rigorous compliance demonstration specific to the design and usage of the individual cleaner. Typically, conditions require that compliance with certain key practices for minimizing VOC emissions is documented in a log book with each use. The cleaners with additional monitoring requirements added in Mod 2 of the Title V are identified as follows: EU U-00020/Process N02, EU U-00054/Process C03 and Process C07 and EU U-00084/Process G03.

As specified by the rule, cold cleaning degreasers must be equipped with 1) a cover that operates easily, 2) an internal (under cover) drainage facility, if practical, and 3) a control system. The log kept for purposes described above will also be used to indicate whether the cleaner is equipped with an internal drainage facility. This requirement has been added to the monitoring conditions for cold cleaners in Mod 2 of the Title V. According to the rule-making guidance, "internal drainage facility" refers to the rack or basket for dripping parts to minimize solvent carry-out. Parts must be allowed to

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drain until dripping stops (at least 15 seconds). At the present time, all of Kodak's cold cleaners subject to this requirement are equipped with internal (under cover) drainage facilities (ie: racks/baskets). Although the rule doesn't specify the conditions under which internal drainage is or is not practical, presumably there may be situations when the size or shape of the part in relation to the cleaner make it impractical to drain the part under cover. In this situation, the facility will take steps to minimize emissions of VOC.

**6NYCRR Part 226.5**

This condition specifies the VOC RACT limit and associated record keeping requirements for a cold cleaner degreasing operation in EU U=00020/ Process N02.

**6NYCRR Part 227 Stationary Combustion Installations**

**6NYCRR Part 227-1.3(a)**

Requires compliance with regulatory opacity limits, allowing for the Department to require Method 9 assessment when necessary.

**6NYCRR Part 227-2.4(d)**

Requires annual boiler tuneup for small boilers for NOx RACT.

**6NYCRR Part 227-2.4(g)**

Requires annual boiler tuneup to limit NOx emissions.

**6NYCRR Part 228 Surface Coating Processes**

**6NYCRR Part 228.1(e)(13)**

Allows for an exemption from VOC RACT requirements for small volume specialty coatings. The facility level permit condition requires that records be maintained which show that the facility-wide total of previously approved specialty coatings is less than 55 gallons on a 12 month rolling basis.

**6NYCRR Part 228.3(b)**

Requires operation and monitoring of regenerative thermal oxidizer (RTO) to limit VOC emissions. Specifies the minimum percent of overall removal efficiency of VOC.

**6NYCRR Part 228.3(c)**

Requires operation and monitoring of process or emission control equipment parameters to achieve the required removal efficiency when using an air cleaning device for compliance with VOC RACT.

**6NYCRR Part 228.3(d)**

Specifies the requirements for using a coating system as a VOC control strategy.

**6NYCRR Part 228.3(e)**

Sets compliance limits for VOC RACT variance for specific coating processes and requires monitoring and periodic re-evaluation of variance. Generally, compliance with a 12 month rolling VOC limit (tons per year) is demonstrated through calculation of monthly emissions using process knowledge and/or sampling data which is then totalled with the previous eleven months for a 12 month total. The evaluations on which

**6NYCRR Part 228.4**

The regulation of opacity at 6 NYCRR Part 228.4 does not specify periodic monitoring. Therefore, the permit

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must contain periodic monitoring to demonstrate compliance with the 20% opacity limit. Surface coating sources subject to Part 228.4, such as the film base extruding and coating operations identified as Process E54 and Process E55 in Emission Unit U-00024, typically have very low particulate emission rates and zero or negligible opacity. Based on the particulate emission calculations and other permit file information, it is unlikely that these sources would have opacity in excess of 20 percent in a 6 minute period. In such cases, a visible observation on a semi-annual frequency was permitted. The permit condition also requires that any instance where there is cause to believe that visible emissions have the potential to exceed the standard must be investigated and followed-up with EPA Method 9 assessment if not corrected within one operating day.

#### **6NYCRR Part 228.5(a)**

Requires record keeping for VOC content and quantities of coatings used. For those coating processes which are required to comply with maximum VOC (lb/gal) limits, the permit conditions cited at Sections 228.7 (Table 1) and 228.8 (Table 2) include the record keeping provisions of Section 228.5(a).

#### **6NYCRR Part 228.5(g)**

Requires monitoring of VOC emission control devices to verify RACT control requirements are achieved.

#### **6NYCRR Part 228.7**

Sets limits on VOC content of coatings for paper and requires monitoring and record keeping to demonstrate compliance. Kodak's typical web coating operations subject to these requirements have VOC content well below the limit. For example, data representing a sample of typical coatings used in EU U-00004; Process P40, which are subject to a limit of 2.9 lbs VOC/regulated gallon of coating, shows an average VOC content of 0.093 lbs VOC/regulated gallon of coating and a maximum VOC content of 0.159 lbs VOC/regulated gallon of coating. Generally, the processes which use higher VOC coatings are equipped with emission control technology. Section 228.5 specifies the required record keeping and methods for sampling and analysis to demonstrate compliance with the VOC content limit. Section 228.5 states that the Department may require a Method 24 analysis of a coating to verify compliance at any time. However, for some higher water content coatings Method 24 has been found to be inaccurate. The majority of Part 228 coatings used at Kodak Park are produced by Kodak which means that accurate formulation data is available to demonstrate compliance without the need for frequent tests. Therefore, the Department has specified that formulation data be the primary method of compliance demonstration. The monitoring conditions for these sources require that up-to-date records of the formulation data are kept which include: certification from the coating manufacturer of the parameters used to determine the VOC content; purchase, usage and/or production records; and any other parameters necessary to verify compliance with the limit. Because the record keeping requirements described in the monitoring conditions are on-going (ie: Kodak completes calculations to ensure compliance and revises the records before any coating formulation changes are made), the "Monitoring Frequency" specified in the permit conditions is stated as "Continuous" (example: EU U-00004, Process P40; Condition 57). The conditions also state that the Department may selectively require Method 24 testing (or other approved sampling & analysis methods) for confirmation of compliance at any time. Sampling and analysis may be particularly important for coatings supplied by outside vendors when formulation data is not as clear.

#### **6NYCRR Part 228.10**

These conditions establish prescriptive work practice requirements under 228.10, such as the proper handling and storage of solvents and solvent-laden rags. The containers subject to these requirements are small and may be categorized as "insignificant activities" (ie. containers that would otherwise be eligible for an exemption from permitting under Part 201 if not for the work practice requirements that apply because of their association

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with a coating line. Specifically, Part 201-3.3(c)(44) provides an exemption from permitting for storage vessels, tanks and containers with a capacity less than 750 gallons. These work practice requirements must be adhered to on a continuous basis whenever the sources are in use. By their nature, these requirements do not lend themselves to parametric monitoring or periodic inspection. The original Title V permit included a requirement for a daily inspection of all the subject containers. After further review and consideration, it was determined that frequent inspections (ex. daily) would be impractical since these are insignificant sources which may not be used on a daily basis. Less frequent inspections (ex. weekly) would not significantly improve compliance with these types of requirements. Operators are accustomed to recording solvent usage for each use. For these reasons, the permit conditions were revised to require that Kodak maintain a log in the operating area and note any open containers found as deviations to be reported to the agency.

**6NYCRR Part 229 Petroleum and Volatile Organic Liquid Storage and Transfer**

**6NYCRR Part 229.3(e)(2)(v)**

Requires VOC storage tank vent control system as alternative to conservation vent and reporting of changes that could increase VOC emissions.

**6NYCRR Part 229.5(d)**

Requires recording of capacity of subject VOC storage tanks.

**6NYCRR Part 230 Gasoline Dispensing Sites and Transport Vehicles**

**6NYCRR Part 230.5(a)**

Requires record keeping of gasoline delivered.

**6NYCRR Part 230.5(b)**

Requires record keeping of gasoline delivered for rule applicability determination.

**6NYCRR Part 231-2 New Source Review in Non-Attainment Areas and Ozone Transport Regions**

**(After Nov 15, 1992)**

**6NYCRR Part 231-2**

Sets specific process emission limits to cap VOC emissions below New Source Review (NSR) applicability thresholds and requires compliance calculations and record keeping.

**6NYCRR Part 231-2.12**

Document Emission Reduction Credits (ERCs) established through permanent shut down of processes.

**6NYCRR Part 234 Graphic Arts**

**6NYCRR Part 234.1(h)**

Allows exemption for VOC RACT non-compliant low-use specialty ink.

**6NYCRR Part 234.3(a)**

Requires compliance with VOC RACT for printing inks.

**6NYCRR Part 234.3(c)**

Sets limits for VOC content of screen printing solutions and requires monitoring and recordkeeping to demonstrate compliance. Section 234.4(b)(2) and (3) specify the required record keeping and methods for sampling and analysis to demonstrate compliance with the VOC content limit. As allowed under 234.4(b)(2),

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the Department has specified that formulation data, production/batch records, and other records be the primary method of compliance demonstration. The monitoring conditions for these sources require that up-to-date records of the formulation data are kept which include: certification from the fountain solution supplier/manufacture which verify the composition of the fountain solution solvent/volatiles; purchase, usage and/or production records; and any other parameters necessary to verify compliance with the limit. Because the record keeping requirements described in the monitoring conditions are on-going (ie: Kodak completes calculations to ensure compliance and revises the records before any coating formulation changes are made), the "Monitoring Frequency" specified in the permit conditions is stated as "Continuous". The conditions also state that the Department may selectively require Method 24 testing (or other approved sampling & analysis methods) for confirmation of compliance at any time.

#### **6NYCRR Part 234.6**

These conditions establish prescriptive work practice requirements under 234.6, such as the proper handling and storage of solvents and solvent-laden rags. The containers subject to these requirements, including those in EU U-00018, are small and may be categorized as "insignificant activities" (ie. containers that would otherwise be eligible for an exemption from permitting under Part 201 if not for the work practice requirements that apply because of their association with a coating line. Specifically, Part 201-3.3(c)(44) provides an exemption from permitting for storage vessels, tanks and containers with a capacity less than 750 gallons. These work practice requirements must be adhered to on a continuous basis whenever the sources are in use. By their nature, these requirements do not lend themselves to parametric monitoring or regular frequency of inspection. The original Title V permit included a requirement for a daily inspection of all the subject containers. After further review and consideration, it was determined that frequent inspections (ex. daily) would be impractical since these sources may not be used on a daily basis. Less frequent inspections (ex. weekly) would not significantly improve compliance with these types of requirements. Operators are accustomed to recording solvent usage for each use. For these reasons, the permit conditions were revised to require that Kodak maintain a log in the operating area and note any open containers found as deviations to be reported to the agency.

#### **40 CFR 52-A.21 Prevention of Significant Deterioration**

Sets emission limits and compliance demonstration requirements for meeting federal Prevention of Significant Deterioration (PSD) requirements for applicable contaminants, including VOC, NOx, Particulate, Sulfur Dioxide and Fluoride.

#### **40 CFR Part 60 Standards of Performance for New Stationary Sources**

##### **40 CFR 60-A General Provisions**

Sets general requirements for monitoring, record keeping and reporting for operations subject to federal New Source Performance Standards (NSPS).

##### **40 CFR 60Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units**

###### **40 CFR 60-Dc.48c(g)**

Requires daily recording of fuel usage.

###### **40 CFR 60-Dc.48c(i)**

Requires two year retention of fuel usage records.

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**40 CFR 60-Kb Standards of Performance for Volatile Organic Liquid Storage Vessels**

**40 CFR 60-Kb.112b(a)(3)(ii)**

Sets kiln operating temperatures and tank hydrocarbon emission concentration to control VOC emissions.

**40 CFR 60-Kb.113b(c)**

Special conditions require compliance with operating plan for storage tank closed vent system.

**40 CFR 60-Kb.116b(a)**

Requires record keeping of storage vessel capacities.

**40 CFR 60-Kb.116b(b)**

Requires determination of storage vessel capacities and record keeping.

**40 CFR 60-SSS Standards of Performance for Magnetic Tape Coating Facilities**

**40 CFR 60-SSS.712(d)(2)**

Specifies work practice requirements for coating mix preparation equipment.

**40 CFR 60-SSS.713(b)(8)**

Specifies requirements for inspections and posting of work practice requirements for coating mix preparation equipment.

**40 CFR Part 61 National Emission Standards for Hazardous Air Pollutants (NESHAP)**

**40 CFR 61-A General Provisions**

Sets general requirements including preconstruction approval, monitoring, record keeping and reporting for operations subject to federal National Emission Standards for Hazardous Air Pollutants (NESHAPS).

**40 CFR 61-E Mercury NESHAP**

**40 CFR 61-E.52(b)**

Sets limit on mercury emissions from wastewater sludge treatment.

**40 CFR 61-E.55(a)**

Requires monitoring, reporting and record keeping of mercury emissions from wastewater sludge treatment.

**40 CFR 61- Subpart FF Benzene Waste Operations NESHAP**

**40 CFR 61-FF.342(a)**

This condition outlines the requirements for chemical manufacturing plants, coke byproduct recovery plants and petroleum refineries to show that they manage less than 10 megagrams (Mg) per year of benzene from facility waste. Staying below this threshold exempts the Kodak facility from the substantive requirements of the Benzene Recovery NESHAP. To demonstrate compliance with the annual 10 Mg limit, the rule specifies a calculation methodology relying on data collected on an annual basis. Therefore, the permit specifies a calculation of annual total benzene waste for demonstration of compliance with the 10 Mg limit. Kodak's annual total of benzene waste subject to this rule has historically been well below 1 Mg per year. In addition to the 10 Mg/year limit, the permit condition requires that the calculation of total annual benzene be repeated whenever there is a change in the process generating the waste that could cause the quantity to increase to 1 Mg/yr or more. Additional conditions in the permit (see Subpart FF citations below) provide further assurance that accurate records are kept and notification to the agencies would occur if the quantity of benzene wastes

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approached the applicability threshold. Because of the historically low quantities of benzene waste at Kodak Park and the annual data collection specified by the rule itself, the annual calculation demonstration required by the permit is sufficient.

**40 CFR 61-FF.356(b)(1)**

This condition specifies on-going record keeping requirements for the identification of waste streams subject to Subpart FF and the detailed information necessary to determine applicability (ie: benzene content).

**40 CFR 61-FF.357(a)**

This condition established the requirements for the initial report on the regulatory status of each benzene-containing waste stream. This is a past requirement.

**40 CFR 61-FF.357(b)**

Requires reporting of waste stream changes that could cause benzene emissions to exceed applicability thresholds.

**40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories**

**40 CFR 63-T Halogenated Solvent Cleaning NESHAP**

**40 CFR 63-T.462(a)(2)**

Specifies work practice requirements for cold solvent cleaning machines.

**40 CFR 63-T.462(c)**

Specifies work and operational practice requirements to reduce solvent emissions from batch cold solvent cleaning machines.

**40 CFR 63-DD Offsite Waste NESHAP**

**40 CFR 63-DD.683(b)(2)(ii)**

Sets limits for exempting handling of off-site wastes containing hazardous air pollutants (HAPs) from control requirements.

**40 CFR 63-DD.688**

Special conditions set operating requirements for handling material transport and storage containers.

**40 CFR 63-EE Magnetic Tape Manufacturing NESHAP**

**40 CFR 63-EE.701**

This condition specifies the record keeping requirements for the exemption from additional Subpart EE requirements.

**40 CFR 63-EE.701(d)**

Special conditions require compliance with applicable federal MACT rule for specified activities.

**40 CFR 63-EE.703(c)(1)**

Sets RTO temperature and carbon adsorber replacement limits to control HAP emissions.

**40 CFR 63-EE.703(c)(4)(i)**

Sets RTO operating temperature to control HAP emissions.

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**40 CFR 63-EE.703(d)(2)**

Sets opacity limit and requires monitoring of emissions.

**40 CFR 63-EE.703(e)(2)**

Sets and requires monitoring of RTO temperature to control HAP emissions, and requires reporting of temperatures outside of set limits.

**40 CFR 63-EE.703(f)(2)**

Sets and requires monitoring of RTO temperature to control HAP emissions, and requires reporting of temperatures outside of set limits.

**40 CFR 63-EE.704(b)(6)**

Requires capture, control and monitoring of HAP emissions from magnetic tape manufacturing operations.

**40 CFR 63-EE.704(b)(7)**

Sets and requires monitoring of air flow rate (capture velocity) to control HAP emissions.

**40 CFR 63-EE.704(c)(2)(ii)**

Specifies calibration requirements for the temperature monitoring equipment on the RTO.

**40 CFR 63-EE.704(c)(10)(iii)**

Requires bypass valves to be closed to control HAP emissions.

**40 CFR 63-EE.706(g)**

Specifies record keeping requirements for carbon adsorbers.

**40 CFR 63-EE.707(i)(1)**

Requires reporting of excess HAP emissions and continuous emission monitor (CEM) system performance.

**40 CFR 63-JJ Wood Furniture Manufacturing Operations NEAHAP**

**40 CFR 63-JJ.800(a)**

Requires record keeping to demonstrate exemption from wood furniture manufacturing NESHAP.

**40 CFR 63-KK Printing and Publishing NESHAP**

**40 CFR 63-KK.829(f)**

Requires record keeping for materials used to demonstrate exemption from printing NESHAP.

**40 CFR 63-PP Containers NESHAP**

**40 CFR 63-PP.926(a)**

Specifies requirements for the inspection of containers and covers (or closure devices).

**40 CFR 63-EEE Hazardous Waste Combustor NESHAP**

**40 CFR 63-EEE.1203**

Special conditions set limits on HAP emissions from chemical and sewer waste incinerators.

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**40 CFR 63-EEE.1207**

Special conditions that require performance testing and reporting of test results for chemical waste and sewage sludge incinerators.

**40 CFR 63-EEE.1211**

Special condition that requires certification of compliance with emission limits.

**40 CFR 63-JJJ Group IV Polymers and Resins Manufacturing NESHAP**

Kodak operated one Thermoplastic Product Process Unit subject to Subpart JJJ where they produced polyethylene terephthalate (PET). This operation was terminated in December 2005. On December 9, 2005, Kodak submitted a Termination of Applicability Notification explaining that they are no longer subject to Subpart JJJ requirements. These requirements and the shut-down emission sources, processes and emission points have been removed from the Title V permit.

**40 CFR 63-MMMM Surface Coating of Misc Metal Parts and Products NESHAP**

Specifies requirements for initial notification under the MACT rule for metal parts and coating operations in EU U-00088.

**40 CFR 63-PPPP Surface Coating of Plastic Parts and Products NESHAP**

Specifies requirements for initial notification under the MACT rule for plastic parts and coating operations in EU U-00088.