



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**Facility Identification Data**

Name: KODAK OPERATIONS AT EASTMAN BUSINESS PARK

Address: 1669 LAKE AVE

ROCHESTER, NY 14652

**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 project is the first renewal of Kodak's Title V Permit ("Ren 1"). Included in the Renewal Permit are numerous revisions, including changes made under the Operational Flexibility ("Op Flex") provision in the permit approved by the Department since the Mod 2 version was issued. Revisions and permit modifications included in this Renewal are highlighted below:

**Facility Name Change**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

The location of Kodak's manufacturing operations in Rochester has been known as Kodak Park with previous permits having the facility name, Kodak Park Division. Since Kodak has changed the name of Kodak Park to Eastman Business Park, the facility name on the permit has been changed to Kodak Operations at Eastman Business Park.

**Consolidation of Emission Units**

The previous version of this permit was organized into 56 emission units, representing Kodak's manufacturing operations at Eastman Business Park. Previously permitted Emission Units and their associated Processes, Emission Sources/Control Devices, and Emission Points have been consolidated into 28 Emission Units in this permit to reflect the down-sizing and consolidation of resources. The Emission Unit descriptions have been revised accordingly.

EUs: U-00002, U-00004, U-00005, U-00006, U-00052, U-00059, U-00074, U-00076, U-00077 and U-00080 have been deleted due to equipment consolidation and/or decommissioning.

EU U-00007 was deleted because Bldg 502 and the package boilers located there were sold in December 2010.

EU U-00024 Polyester Film Base Manufacturing Operations now include the Bldg 351 Hot Oil Heater which was previously permitted under U-00050.

EU U-00008 Waste storage and wastewater treatment (Kings Landing) operations, including wastewater sludge incineration now includes sources previously permitted under EU U-00017 and U-00041.

EU U-00020 Semiconductor operations will be deleted when the transfer of ownership occurs on or about November 1, 2011.

EU U-00019, U-00063 and U-00078 have been deleted because of the sale of the Silver Recovery and Silver Nitrate operations to Rochester Silver Works on September 30, 2011.

Note that these operations had already been reorganized the Kodak Draft Renewal Permit:

EU U-00078 Silver Flow washing, drying and water treatment operations now include sources previously permitted under EU U-00046, U-00001, and U-00074.

EU U-00063 Silver Flow refining and purification operations now include sources previously permitted under EU U-00014, U-00028, U-00052 and U-00076.

**Re-Organization & Consolidation of 6 NYCRR Part 212 Permit Conditions**

6 NYCRR Part 212.4(c) and Part 212.6(a)

For each emission point and/or source subject to the Part 212.4(c) particulate standard and having no control device or other unique compliance monitoring method, a monitoring condition requiring semi-annual compliance demonstration based on calculation of emissions was included in the previous versions of this permit. Similarly, for each emission point subject to the Part 212.6(a) opacity standard but having no opacity monitoring device, a monitoring condition requiring semi-annual compliance demonstrations based on observations of opacity was included in the previous permit. Because applicable sources are numerous and widespread throughout Eastman Business Park, these general monitoring conditions were repeated throughout the permit. In order to streamline the permit and eliminate this redundancy, these two conditions have been re-located to the Emission Unit level of the permit with individual applicable sources listed. Each condition will appear once in the permit for each Emission Unit having applicable sources. This revision does not affect the applicability of the requirement or Kodak's compliance methodology.

6 NYCRR Part 212.4(a)

For each emission point having authorized emissions below the thresholds for specified level of control under Tables 2, 3 or 4 of Part 212, a general condition stating that these thresholds would not be exceeded was included in the previous versions of this permit. This general Part 212.4(a) condition was widespread- often repeated numerous times within an Emission Unit. In an effort to streamline the permit and eliminate this redundancy, the same general condition has been moved to the facility level. This



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

revision does not change the applicability of the requirement and Kodak will continue to maintain records of their emissions in order to comply with this condition just as they currently do.

**Minor Modification to Title V Permit/Renewal 1 to add facility-level "PUG" condition under 40 CFR 63.2535(l)**

A facility-level condition has been added to the permit as a minor modification of the permit to create a process unit group ("PUG") according to the provisions of 40 CFR 63.2535(l). The PUG is developed in order to allow Kodak to manufacture a small quantity of pharmaceutical pre-cursors under the MON MACT (40 CFR Subpart FFFF) that would otherwise be subject to the Pharmaceuticals MACT (40 CFR 63 Subpart GGG). There will be no new equipment or modifications to the process to accommodate the new products. The PUG is created such that the predominant product remains MON applicable.

**Addition of 40 CFR 64 Compliance Assurance Monitoring (CAM) Requirements**

The Renewal Permit ("Ren 1") includes new CAM conditions or amended existing periodic monitoring conditions at the emission unit level for the pollutant/standard/pollutant-specific emission unit combination(s) that trigger CAM. These conditions are intended to cover the necessary elements of a CAM submittal as described in 64.4 for the affected emission units: U-00008, U-00009, U-00011, U-00019, U-00021, U-00060, U-00063, U-00086, and U-00087. Justification of the proposed CAM, required under paragraph 64.4(b), and past test data and associated documentation used to support the proposed monitoring, required under 64.4(c), were provided as part of Kodak's Renewal application and are included in the PRR. Additional facility-level general CAM requirements are included under the citations 40 CFR 64.7, 64.8, and 64.9. Note that CAM conditions for EU U-00019 and U-00063 were removed from the Draft "Ren 1" permit when they were transferred to Rochester Silver Works on Sept. 30, 2011.

**Addition of Specific Monitoring Conditions to Address New Requirements**

40 CFR 63 Subpart ZZZZ Reciprocating Internal Combustion Engines (RICE) NESHAP

Kodak is subject to the new National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE). Conditions for the RICE rule, effective May 3, 2010, were included in the Renewal ("Ren 1") permit under a new Emission Unit, EU F-AC003, to represent applicable Kodak engines located throughout Eastman Business Park. The six engines currently subject to the rule were previously permitted under EU F-AC002 and now are grouped into three Processes according to their applicability category under the rule. Future compliance dates of May 3, 2013 and October 19, 2013 are specified under the rule depending on the type of engine, compression ignition (CI) or spark ignition (SI).

40 CFR 63 Subpart BBBBB Semiconductor Manufacturing MACT

Added specific conditions to EU U-00020 of the permit to satisfy requirements of the Semiconductor MACT rule. Previous version of the permit included a compliance plan. The compliance issues of that plan have been resolved through the anticipated rule revisions, now incorporated into the permit.

40 CFR 63 Subpart EEE Hazardous Waste Combustor MACT

Added detailed monitoring conditions for operating parameters and federate limits for the Multiple Hearth Incinerator (EU U-00008) to address requirements of the MACT rule as well as 6 NYCRR Part 212. These conditions are consistent with Kodak's compliance testing and the Notice of Compliance (NOC) referenced in the previous permit.

40 CFR 63 Subpart EEEE Organic Liquid Distribution MACT



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

Added specific conditions to address Subpart EEEE applicability of EU U-00009 and EU U-00021 distillation sources. Detailed monitoring requirements were added for the Distilling West Methanol/Water Scrubber based on compliance testing.

40 CFR 63 Subpart FFFF MON MACT

Added specific conditions for EU U-00009, U-00021, U-00053 and U-00060 distillation and synthetic chemical manufacturing operations to address the requirements of the Miscellaneous Organic Chemical Manufacturing MACT

40 CFR 63 Subpart HHHHH Miscellaneous Coatings MACT

Added specific conditions for EU U-00048 & U-00016 to address requirements of the Miscellaneous Coating MACT.

40 CFR 63 Subpart KK Printing and Publishing MACT

Added conditions to address Subpart KK applicability at EU U-00086 (Thermal Media Manufacturing Operations), which has been incorporated into the Title V permit. These operations were compliant with Subpart KK requirements under the previously applicable Air State Facility construction permit (See New Emission Unit U-00086 below).

40 CFR 63 Subpart DD Offsite Waste Recovery MACT

Added condition to allow for Kodak to take in off-site wastewater for treatment at their Kings Landing WWTP under the exemption provision which specifies record keeping requirements to show that the total annual quantity of HAP (hazardous air pollutants) contained in the off-site material remain less than 1 megagram per year. This exemption was previously granted for Kodak's Bldg 218 Hazardous Waste treatment facility, but removed from the permit when the Bldg 218 facility ceased handling and treatment of wastes.

40 CFR 63 Subpart T Halogenated Solvent Cleaning MACT

Facility level conditions have been added to address new requirements for cleaners subject to this rule, including a new facility wide emission limit for methylene chloride and new solvent usage record keeping requirements. Conditions have also been added to EU U-00011 to address requirements for specific cleaning units.

Two of Kodak's subject cold cleaning units, Emission sources 053CA and 053CB, are equipped with lip exhaust located beneath the tight-fitting covers and are exhausted to the Bldg 53 Carbon Absorber System (Control ID 05302) during various portions of the cleaning cycle. These cleaners and their tie-in to the available carbon control system were designed for worker safety prior to Subpart T applicability. While Subpart T does have provisions for use of carbon adsorption for batch vapor and in-line cleaning machines, the regulation has no similar compliance provisions for batch cold cleaning units. On 4/11/2005, Kodak submitted a Request for Equivalent Method of Control to the USEPA to allow venting of Emission Sources 053CA and 053CB to the B-53 Carbon Adsorber System. In the Title V Renewal application, Kodak provided a compliance plan for the two cleaners (ES 053CA and 053CB) with regard to the "tight fitting cover" provisions of 40 CFR 63.462(a)(2). The request to EPA was updated on 6/2/10 to include new provisions of 40 CFR 63.471. The Request for Equivalent Method of Control addresses the two cleaners which are directed to the carbon adsorption system during various portions of the cleaning cycle. Kodak has requested that they be exempt from the facility-wide standards of 40 CFR 63.471 on the basis that the specified measurement techniques are not representative of this type of cleaner and will result in excess use of solvent and higher emissions. Kodak is awaiting a response from EPA on the Request for Equivalent Method of Determination.

**Other Rule Revisions Necessitate Changes to Permit**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

6 NYCRR Part 227

Recent revisions to Part 227 opacity and NO<sub>x</sub> RACT requirements affected conditions in EU U-FAC002, EU U-00007 and EU U-00050.

6 NYCRR Part 228

A recent rule revision created two subparts. The existing surface coating requirements are now under Subpart 228-1 and new requirements for adhesives are covered under Part 228-2. A new facility level emission unit F-AC004 has been added to the permit to address facility-wide Part 228-2 applicability.

6 NYCRR Part 231

Facility level conditions have been included to address the new “Reasonable Possibility” provisions of the revised Part 231 rule (231-11.2(b) and (c)). These new record keeping requirements apply if a project is evaluated for New Source Review applicability using the *projected actual* emissions, rather than potential emissions (PTE)

**EU U-00008 Multiple Hearth Incinerator (MHI) (EP 09503) Part 212.10(c )(3) NO<sub>x</sub> RACT**

This permit includes a limit of 31.2 tpy on a rolling 12-month basis for emissions of Nitrogen Oxides (NO<sub>x</sub>) from the Bldg 95 Multiple Hearth Incinerator (MHI). This limit is a reduction from the previously permitted 40.3 tpy NO<sub>x</sub> RACT limit, and is based on more recent emissions data and an August 2007 re-evaluation of NO<sub>x</sub> reduction options for this source.

**EU U-00009 Minor Modification**

A minor modification was approved in September 2009 to authorize a process change. Three conditions were added to EU U-00009 to address applicability of 40 CFR 60 Subparts VV, DDD, RRR and 6NYCRR Part 236. The subject equipment is currently compliant with the leak detection provisions and repair requirements in the MON MACT rule (40 CFR 63 Subpart FFFF). Provisions in the MON MACT and Part 236 allow the option of complying with the equivalent or more stringent MON MACT rule in lieu of the 40 CFR 60 NSPS rules and Part 236 leak detection requirements.

**EU U-00053 Synthetic Chemicals, West Chemicals Department**

In this permit, the limit of emissions of Volatile Organic Compounds (VOC) from sources in Process I35 (EP 325X3) established in accordance with 6 NYCRR Part 212 Reasonably Available Control Technology (RACT) requirements has been reduced from 105 tpy to 66 tpy. This reduced limit is a result of decreased production in the Synthetic Chemicals Division and was established under the third modification of Kodak’s Title V (“Mod 3”) when the carbon control system on EP 325X3 was decommissioned.

**EU U-00053 West Chemicals and EU U-00060 North Chemicals**

The requirements of 6 NYCRR Part 233 Pharmaceutical and Cosmetic Manufacturing Processes have been added to the Renewal Permit (“Ren 1”) to allow for production of synthetic chemicals to be used in pharmaceutical and cosmetic products. Operations subject to Part 233 VOC RACT would be conducted on existing equipment which is currently subject to Part 212 VOC RACT requirements. Emissions from Part 233 operations at West Chemical (Bldg 325) and North Chemicals (Bldg 301-304) will be included under existing Part 212 caps of 66 tons per year and 150 tons per year, respectively, based on RACT demonstrations that no additional process changes, reformulations, or add-on control devices are available that are both technically and economically feasible.

**EU U-00063 Revised Monitoring Conditions**

In accordance Consent Order R8-20010314-10, installation of a new scrubber system and the required testing on the Silver Recovery Roaster have been completed. Detailed monitoring requirements for the new control system have been added to the permit based on performance test results. These conditions replace testing requirements and interim limits based on the NSR/PSD compliance plan in the previous



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

permit. Obligations under the compliance plan, associated with Consent Order R8-20010314-10, have been met.

Based on emissions testing required under the Order and an evaluation of Reasonably Available Control Technology (RACT) which demonstrated that additional controls for emissions of Nitrogen Oxides (NO<sub>x</sub>) from the Roaster were not technically and economically feasible, a NO<sub>x</sub> limit of 10.5 tpy on a rolling 12-month basis has been added to the permit. This NO<sub>x</sub> limit under 6 NYCRR Part 212.10(c)(3), replaces the 25.5 tpy limit in previous versions of the permit for emissions of NO<sub>x</sub> from the Silver Recovery Roaster (ES 101AJ) and Smelter (ES 101AI) while they were vented together to EP 10101. Emission tests indicated that the potential NO<sub>x</sub> emissions from the Smelter alone is less than 3 lb/hr and therefore does not trigger the RACT requirements.

Note that EU U-00063 and all of the operating requirements associated with the Silver Recovery Roaster and Scrubber system were transferred to Rochester Silver Works and removed from Kodak's Proposed "Ren 1" permit.

**EU U-00083 and U-00084 Revisions**

Elimination of New Source Review (NSR) cap and Re-Organization of Bldg 308 Sources

New Source Review project caps for emissions of VOC and Particulate emissions, which were included in the permit under EU U-00083 when numerous sources were moved from the old Elmgrove Facility to Kodak Park ("Janus Project"), have been removed from this Title V Renewal Permit ("Ren 1"). These caps were no longer relevant since many of the applicable sources have been shut down. The total potential emissions of the remaining capped sources was well below NSR thresholds. Most of these sources had been exempt from permitting until their inclusion in the Janus project and associated NSR cap. With the cap removed, the few remaining sources have been exempt once again. Documentation to support the removal of these NSR caps, including the potential emissions and exempt status of some sources, was provided in Kodak's Nov 30, 2009 Amendment to the Title V Renewal Application for EU U-00083 and U-00084. Remaining EU U-00083 sources in Bldg 308 have been moved into EU U-00084 to consolidate sources in the same building.

Modification of EU U-00084 to Permit 3 Machines

A modification of EU U-00084 has been included in this permit to allow commercial production on three coating machines which were previously used for research and development only. Kodak submitted the application for minor modification on July 2, 2010.

EU U-00084 EP 308B7 Part 212.10(f) VOC RACT

This emission point vents support equipment associated with the pilot coating operations (EP 308B5). A VOC RACT variance was included in previous versions of the permit at 12 tpy. Because of expected production increases, a larger cap of 35 tpy is proposed in this Renewal permit. A re-evaluation of RACT demonstrated that no additional process changes, reformulations, or add-on control devices are available that are both technically and economically feasible.

Part 228 VOC RACT Variance for Bldg 308 DPC Coating Machine & Support Processes

An additional Process G10 was added to the permit as proposed by Kodak in an amendment to the Title V Renewal Application (Sept 28, 2010) to enable the use of Part 228 non-compliant coatings on the DPC machine. A Part 228 VOC RACT evaluation was conducted which included control options for both the DPC coatings and the support operations subject to Part 212 VOC RACT. The evaluation concluded that process changes, reformulation, and add-on control alternatives were not found to be technically and economically feasible based on the cost per ton of VOC to be controlled. Therefore, a permit condition has been added which limits the non-compliant coating emissions from this coating process (EP 308B5), along with emissions from the support operations (EP 308B7) to the existing 35 tpy limit.



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

**Permit ID: 8-2614-00205/01801  
Renewal Number: 1  
08/19/2013**

**New Emission Unit U-00086**

A new emission unit, EU U-00086, and applicable permit requirements were added to the permit for the Thermal Media Manufacturing Operations in Bldg 319 to replace the Air State Facility Permit (ID 8-2614-00205/01837) that authorized the construction and initial operation.

**Attainment Status**

KODAK OPERATIONS AT EASTMAN BUSINESS PARK 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*	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:**

Kodak Operations at Eastman Business Park (formerly known as Kodak Park) is a large, integrated manufacturing plant producing photographic films, papers, and synthetic organic chemicals. Eastman Business Park 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 OPERATIONS AT EASTMAN BUSINESS PARK is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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 OPERATIONS AT EASTMAN BUSINESS PARK is defined by the following emission unit(s):

Emission unit U00025 - BUILDING 305 SYNTHETIC CHEMICAL DIVISION 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

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

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):

326B7, 326C1, 326C2

Process: P93 is located at Building 326 - GENERAL PROCESS EMISSION SOURCES WITH PARTICULATE EMISSIONS (NOT REQUIRING CONTROL)

Process: P97 is located at Building 326 - GENERAL PROCESS EMISSION SOURCES WITH NO PARTICULATE EMISSIONS

Emission unit U00045 - WEB COATING OPERATIONS FOR PURPOSES OF RESEARCH AND DEVELOPMENT ONLY, INCLUDING SOURCES OF INCIDENTAL INDOOR FUGITIVE EMISSIONS.

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

08212

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

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

Emission unit U00047 is associated with the following emission points (EP):

03802, 03810, 03812, 03813, 03815, 03816, 03817, 03818



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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

Process: P65 is located at Building 038 - GENERAL PROCESS EMISSION SOURCES WITH <3.0 LB/HR NOX

Emission unit U00048 - BUILDING 148 BATCH SYNTHETIC CHEMICALS AND PRECIOUS METALS 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

Process: I01 is located at Building 148 - BATCH SMALL SCALE MISCELLANEOUS ORGANIC CHEMICAL AND PRECIOUS METALS MANUFACTURING OPERATIONS SUBJECT TO 40 CFR 63 SUBPART FFFF, WITH SOLID PARTICULATE EMISSIONS.

Process: I50 is located at Building 148 - BATCH SMALL SCALE MISCELLANEOUS COATING MANUFACTURING OPERATIONS SUBJECT TO 40 CFR PART 63 SUBPART HHHHH, WITH SOLID PARTICULATE EMISSIONS.

Emission unit U00053 - BUILDING 325 BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS, INCLUDING DRYING, SEPARATING, MATERIAL TRANSFER, AND STORAGE, SUBJECT TO MON MACT. INCLUDES PROCESSES AND SOURCES PREVIOUSLY PERMITTED UNDER EU U-00002.

Emission unit U00053 is associated with the following emission points (EP):  
325B0, 325B3, 325X3

Process: I35 is located at Building 325 - BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS SUBJECT TO BUILDING 325 VOC (VOLATILE ORGANIC COMPOUND) RACT (REASONABLY AVAILABLE CONTROL TECHNOLOGY) CAP.

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 WITH VOLATILE ORGANIC COMPOUND (VOC) EMISSION RATE POTENTIAL (PTE) LESS THAN 3 LBS PER HOUR (LB/HR)

Emission unit U00056 - BUILDING 304 BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS, INCLUDING STORAGE TANKS, SUBJECT TO MON MACT AND NOT SUBJECT TO NORTH CHEMICALS DEPARTMENT VOC RACT (VOLATILE ORGANIC COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY) CAP, INCLUDING ASSOCIATED FUGITIVE EMISSIONS. (Revised to include Bldg 304 sources previously permitted as EU U-00077)



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

Emission unit U00056 is associated with the following emission points (EP):  
304A7, 304A8, 304A9

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

Process: I33 is located at Building 304 - BLDG 304, BAY-13 OPERATIONS SUBJECT TO PROCESS-SPECIFIC VOC RACT CAP

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

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

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

30105, 301X2, 303A8, 303B1, 303X1, 303X2, 303X3, 30403, 304A0, 304B0, 304X1, 304X2, 337A2

Process: I24 is located at Building 303 - BUILDING 303 BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS

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 CAPS.

Process: I27 is located at and 337, Building 304 - BUILDING 304 SYNTHETIC CHEMICAL SEPARATING AND BLENDING OPERATIONS.

Process: I28 is located at Building 304 - BUILDING 304 BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS

Process: I45 is located at Building 304 - BUILDING 304 HARDENER MANUFACTURING OPERATIONS SUBJECT TO FEDERALLY ENFORCEABLE EMISSION CAPS FOR VOCS AND PARTICULATES

Process: I49 is located at and B-303, Building 301 - BUILDING 301 AND 303 GLYCOL STORAGE TANKS

Process: I51 is located at Building 337 - BUILDING 337 POLYMER MANUFACTURING OPERATIONS

Emission unit U00075 - EMULSION MAKING, DRUM MIXING AND SOLDERING OPERATIONS AND EQUIPMENT WITH INCIDENTAL INDOOR FUGITIVE EMISSIONS

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

Process: S10 is located at Building 082 - GENERAL PROCESS EMISSION SOURCES WITH VOC EMISSION RATE POTENTIAL < 3.0 LB/HR (ie. EMULSION MAKING, DRUM MIXING AND SOLDERING OPERATIONS).



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

Emission unit U00083 - SOURCES IN BUILDINGS 35, 36, 81, 205, 214 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. (non-exempt Bldg 308 sources have been relocated to EU U-00084)

Emission unit U00083 is associated with the following emission points (EP):  
08116, 08130, 08132, 08133, 08134, 08135, 20504

Process: Y07 is located at Building 205 - BUILDING 205 EMISSION POINT SOURCES ASSOCIATED WITH COMPONENT/EQUIPMENT MANUFACTURING & ASSEMBLY.

Process: Y10 is located at Building 081 - BUILDING 81 MICRO-ELECTRO-MECHANICAL SYSTEMS (MEMS) MANUFACTURING & ASSEMBLY, RELATED R&D ACTIVITIES AND ASSOCIATED FUGITIVE EMISSIONS

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):  
059K6, 059K7, 308B5, 308B6, 308B7, 308B8, 308C2, 308C3

Process: G01 is located at AND 59, Building 308 - WEB FORMATION OR COATING OF PLASTIC/PAPER FOR R&D ONLY, EXEMPT FROM THE REQUIREMENTS OF 6 NYCRR PART 228. EMISSION SOURCES 308AA SUBJECT TO NSR RECORD KEEPING / CAP FOR VOCS.

Process: G02 is located at Building 308 - NATURAL GAS-FIRED DRYER SUBJECT TO PART 227.

Process: G05 is located at Building 308 - GENERAL PROCESS EMISSION SOURCES SUBJECT TO NSR RECORD KEEPING AND CAP FOR VOCS.

Process: G06 is located at AND 59, Building 308 - GENERAL PROCESS EMISSION SOURCES WITH (1) VOC/NO<sub>x</sub> EMISSIONS LESS THAN RACT THRESHOLDS OF 3.0 LB/HR ERP AND (2) NO<sub>x</sub> EMISSIONS LESS THAN 15 LB/DAY (FOR NO<sub>x</sub> SOURCES CONSTRUCTED AFTER 8/15/94).

Process: G07 is located at Building 308 - COMMERCIAL EXTRUSION / CASTING OF FILM WEB, SUBJECT TO PART 212 ONLY

Process: G08 is located at AND 59, Building 308 - COMMERCIAL COATING OF FILM BASE OR PAPER, USING PART 228 COMPLIANT COATINGS.

Process: G09 is located at Building 059 - COMMERCIAL COATING OF FILM BASE OR PAPER, UTILIZING LOW VOLUME EXEMPTION OF 6NYCRR 228.1(e)(13). EXEMPT FROM 6NYCRR PART 212 PER 6NYCRR 212.7(I), AND EXEMPT ACTIVITY PER 6NYCRR 201-3.2(c)(31).

Process: G10 is located at Building 308 - COMMERCIAL COATING OF FILM BASE OR PAPER, USING PART 228 NON-COMPLIANT COATING SOLUTIONS, SUBJECT TO A PART 228 VOC RACT CAP.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

Emission unit U00085 - BUILDING 59 WEB COATING OF PLASTIC/PAPER 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):

059K0, 059K1, 059K2, 059K3, 059K4, 059K5

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 059 - GENERAL PROCESS EMISSION SOURCES USED FOR R&D ACTIVITIES (E.G., MELT PREPARATION, & SOLUTION DELIVERY).

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 (E.G., MELT PREPARATION & SOLUTION DELIVERY).

Process: S29 is located at Building 059 - COMMERCIAL COATING OF PLASTIC/PAPER, UTILIZING LOW VOLUME EXEMPTION 6 NYCRR PART 228-1.1(E)(13). EXEMPT FROM 6 NYCRR PART 212 PER 6 NYCRR 212.7(l)

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):

349A5, 349B5, 349B6, 349B7, 349B8, 349C2, 349C3, 349C8, 349C9, 349D0, 349D2, 349D3, 349D4, 349D5, 349D6, 349D7, 349E0, 349E2, 349E3, 349E4, 349E5, 349E6, 349E7, 349E8, 349E9, 349F0, 349F1, 349F2, 349F3, 349F5, 349F6, 349F7, 349F8, 349F9, 349G1, 349G3, 349G4, 349G5, 349H1, 349H2, 349H3, 349H4, 349H9, 349J2, 349J3

Process: N10 TONER MANUFACTURING GENERAL PROCESS EMISSION SOURCES WITH VOC AND/OR NOX EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LBS/HR.

Process: N40 is located at Building 349 - ROOM 113 SOLVENT RECYCLE AND STORAGE TANK(S)

Process: N41 is located at Building 349 - ROOM 113 TONER MANUFACTURING OPERATIONS WITH VOC EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LB/HR

Process: N42 is located at Building 349 - ROOM 116/132/137 TONER MANUFACTURING OPERATIONS WITH VOC EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LB/HR

Process: N43 is located at Building 349 - ROOM 116/132/137 TONER MANUFACTURING OPERATIONS - SOLVENT AND WASTE STORAGE TANK(S)

Process: N44 is located at Building 349 - ROOM 116/132/137 TONER MANUFACTURING OPERATIONS WITH VOC EMISSION LESS THAN 3.0 LB/HR AND PARTICULATE EMISSIONS



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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

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

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

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

Emission unit U00008 - WASTEWATER TREATMENT SLUDGE INCINERATION (BLDG 95 MHI), AND BLDG 218 CONTAINERIZED WASTE MANAGEMENT OPERATIONS, INCLUDING ASSOCIATED FUGITIVE EMISSIONS.

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

09103, 09104, 09105, 09106, 09107, 09503, 09504, 09508, 09511, 09601, R1601, R1603

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

Process: K04 is located at also Bldg 95, Building 091 - STORAGE TANKS SUBJECT TO 6 NYCRR PART 229

Process: K06 is located at also 95, R16, 96, Building 091 - GENERAL PROCESS EMISSION SOURCES ASSOCIATED WITH WASTEWATER TREATMENT OPERATIONS

Emission unit U00009 - DISTILLING WEST MANUFACTURING OPERATIONS, INCLUDING DISTILLATION EQUIPMENT, STORAGE TANKS, MISCELLANEOUS ORGANIC CHEMICAL MANUFACTURING EQUIPMENT SUBJECT TO MON MACT, EQUIPMENT IN ORGANIC LIQUID DISTRIBUTION SERVICE SUBJECT TO OLD MACT, AND ASSOCIATED FUGITIVE EMISSIONS.

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

322B1

Process: H12 is located at Building 322 - DISTILLING WEST OPERATIONS WITH EMISSION CONTROLS TO MEET MACT, RACT AND/OR BACT REQUIREMENTS, INCLUDING STORAGE



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

TANKS AND DISTILLATION PROCESSES.

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, 03054, 03055, 03057, 03059, 03062, 03078, 030L0, 030L1, 030L2, 030L3, 030L4, 030M5, 030M6, 030M7, 030M9, 030N1, 030N4, 030N6, 030P0, 030P1, 030P8, 04690  
Process: P03 is located at Building 030 - GENERAL PROCESS EMISSION SOURCES, WITH PARTICULATE EMISSIONS (REQUIRING CONTROL)

Process: P04 is located at Building 030 - GENERAL PROCESS EMISSION SOURCES WITH PARTICULATE EMISSIONS (NOT REQUIRING CONTROL).

Process: P14 is located at Building 030 - GENERAL PROCESS EMISSION SOURCES WITH NO PARTICULATE EMISSIONS

Process: P15 is located at Building 030 - STORAGE VESSELS SUBJECT TO PART 229

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

Process: S13 is located at Building 035 - GENERAL SIZE REDUCTION AND DISPERSION OPERATIONS INCLUDING SOURCES < 3 LB/HR VOC ERP (PARTICULATE MILLING AND MIXING).

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

Emission unit U00020 is associated with the following emission points (EP):  
08101, 08102, 08103, 08104, 08105, 08109, 08110, 08111, 08121, 08122, 08228

Process: N01 is located at Building 081 - SEMI CONDUCTOR MANUFACTURING WITH NO HAP EMISSIONS SUBJECT TO 40 CFR 63 SUBPART BBBB AND PART 212 TABLE 2 REQUIREMENTS ONLY

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 NOT SUBJECT TO SEMI CONDUCTOR MNFG SUBPART BBBB REQUIREMENTS.

Process: N04 is located at Building 081 - SEMI CONDUCTOR MANUFACTURING WITH ORGANIC HAP EMISSIONS SUBJECT TO 40 CFR 63 SUBPART BBBB AND PART 212 TABLE 2 REQUIREMENTS ONLY



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

Process: N05 is located at Building 081 - SEMI CONDUCTOR MANUFACTURING WITH INORGANIC HAP EMISSIONS SUBJECT TO 40 CFR 63 SUBPART BBBBBB AND PART 212 TABLE 2 REQUIREMENTS ONLY

Process: N06 is located at Building 081 - SEMI CONDUCTOR MANFG WITH COMBINED ORGANIC AND INORGANIC HAP EMISSIONS SUBJECT TO 40 CFR 63 SUBPART BBBBBB AND PART 212 TABLE 2 REQUIREMENTS ONLY

Emission unit U00021 - DISTILLING EAST MANUFACTURING OPERATIONS INCLUDING SOLVENT DISTILLATION, STEAMING, STORAGE, DRUM FILLING OPERATIONS, EQUIPMENT IN ORGANIC LIQUID DISTRIBUTION SERVICE SUBJECT TO OLD MACT (40 CFR 63 SUBPART EEEE), AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00021 is associated with the following emission points (EP):

11601, 12007, 120A5, 120A9, 14201, D6305

Process: H80 is located at 115,116,142, D63, Building 120 - DISTILLING EAST OPERATIONS ASSOCIATED WITH PROCESSING SOLVENT GENERATED BY FILM MANUFACTURING ON-SITE AT EASTMAN BUSINESS PARK.

Process: H81 is located at 142, 115, 116, Building 120 - DISTILLING EAST OPERATIONS ASSOCIATED WITH PROCESSING SOLVENT GENERATED BY SYN CHEM OPERATIONS ON-SITE AT EASTMAN BUSINESS PARK AND MATERIALS GENERATED OFF-SITE.

Process: H82 is located at Building 120 - WASTE SOLVENT TANKS ASSOCIATED WITH DISTILLING EAST OPERATIONS

Emission unit FAC003 - FACILITY EMISSION UNIT FOR EMERGENCY STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES (RICE) SUBJECT TO SUBPART ZZZZ RICE RULE. NO PART 225 (SULFUR IN FUEL) APPLICABILITY BASED ON THE ENGINES SIZE AND FUEL TYPE.

Process: CIL is located at Building FACILITY - COMPRESSION IGNITION ENGINES LOCATED THROUGHOUT EASTMAN BUSINESS PARK LESS THAN OR EQUAL TO 500 BRAKE HORSEPOWER WHICH COMMENCED CONSTRUCTION OR RECONSTRUCTION BEFORE JUNE 12, 2006.

Process: EHG ENGINES LOCATED THROUGHOUT EASTMAN BUSINESS PARK GREATER THAN 500 BRAKE HORSEPOWER WHICH COMMENCED CONSTRUCTION OR RECONSTRUCTION BEFORE DECEMBER 19, 2002.

Process: SIL is located at Building FACILITY - SPARK IGNITION ENGINES LOCATED THROUGHOUT EASTMAN BUSINESS PARK LESS THAN OR EQUAL TO 500 BRAKE HORSEPOWER WHICH COMMENCED CONSTRUCTION OR RECONSTRUCTION BEFORE JUNE 12, 2006.

Emission unit U00089 - SMALL SCALE CHEMICAL MANUFACTURING OPERATIONS, AND



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

ASSOCIATED FUGITIVE EMISSIONS SUBJECT TO MON MACT (SUBPART FFFF)

Process: S11 is located at Building 081 - SMALL SCALE CHEMICAL MANUFACTURING AND DISPERSION OPERATIONS INCLUDING SOURCES <3.0 LB/HR VOC ERP

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

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

Process: H07 is located at Building 103 - RAW MATERIAL HANDLING AND MIXING OPERATIONS WITH VOLATILE ORGANIC COMPOUND (VOC) EMISSION RATE POTENTIAL LESS THAN 3 POUNDS PER HOUR (LBS/HR) AND SUBJECT TO MON MACT.

Emission unit FAC004 - FACILITY EMISSION UNIT FOR USE OF ADHESIVES, SEALANTS, ADHESIVE PRIMERS & SEALANT PRIMERS

Process: AD1 is located at Building FACILITY - MISCELLANEOUS OPERATIONS LOCATED THROUGHOUT EASTMAN BUSINESS PARK USING ADHESIVES, SEALANTS, ADHESIVE PRIMERS & SEALANT PRIMERS, SUBJECT TO PART 228-2

Process: AD2 is located at Building FACILITY - MISCELLANEOUS OPERATIONS LOCATED THROUGHOUT EASTMAN BUSINESS PARK USING ADHESIVES, SEALANTS, ADHESIVE PRIMERS & SEALANT PRIMERS, WITH FACILITY EMISSIONS ELIGIBLE FOR LOW-USE EXEMPTION

Process: AD3 is located at Building FACILITY - MISCELLANEOUS OPERATIONS LOCATED THROUGHOUT EASTMAN BUSINESS PARK USING ADHESIVES, SEALANTS, ADHESIVE PRIMERS & SEALANT PRIMERS, FOR RESEARCH AND DEVELOPMENT

Emission unit U00024 - POLYESTER FILM BASE MANUFACTURING OPERATIONS INCLUDING SOLID STATE POLYMERIZATION, EXTRUSION, COATING, STORAGE, MATERIAL HANDLING, AND HOT OIL HEATER (PREVIOUSLY EU U-00050), AND ASSOCIATED FUGITIVE EMISSIONS.

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

31705, 31707, 31709, 317B2, 317E7, 317F0, 317F4, 317F6, 317F8, 317F9, 317G0, 317G1, 317G3, 317G5, 317G6, 317G7, 317I1, 317I2, 317K2, 317R3, 317R6, 317R7, 317S1, 317S3, 317S4, 317T5, 317T9, 317V9, 317W1, 317W2, 317W3, 317W4, 317W5, 317X1, 317X3, 317X5, 317X6, 317X7, 317Y3, 317Y5, 317Y7, 317Y8, 317Y9, 317Z0, 317Z2, 317Z3, 317Z4, 317Z5, 317Z6, 317Z8, 317Z9, 33501, 33502, 351C8, 351D0

Process: E52 is located at Building 317 - GENERAL PROCESS EMISSION SOURCES SUBJECT TO



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

THE 0.050 GR/DSCF STANDARD. NOTE THAT EMISSION SOURCES 317DQ, 317DL AND 317JE (INCLUDED IN THIS PROCESS) HAVE A VOC ERP < 3 LBS/HR. (I.E. WEIGHING, BLENDING & CONVEYANCE)

PARTICULATE EMISSIONS (I.E. MIXING, CHEMICAL STORAGE & CLEANING)

Process: E55 is located at Building 317 - FILM BASE EXTRUDING AND COATING OPERATIONS USING COMPLIANT COATINGS

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

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

Process: E63 is located at Building 351 - VOC EMISSION SOURCES WITH ERP <3 LB/HR ASSOCIATED WITH HEAT TRANSFER OPERATIONS, INCLUDING THERMINOL TANKS, HOT OIL HEATER (OPERATED AS A COMBUSTION SOURCE), AND ASSOCIATED FUGITIVE EMISSIONS

**Title V/Major Source Status**

KODAK OPERATIONS AT EASTMAN BUSINESS PARK 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 the potential emissions of many individual Hazardous Air Pollutants (HAPS) is over 10 tpy and over 25 tpy for total HAPS.

**Program Applicability**

The following chart summarizes the applicability of KODAK OPERATIONS AT EASTMAN BUSINESS PARK with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
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
SIP	YES

NOTES:



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**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.

**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.

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

**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
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**SCC Codes**

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents

a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

**SCC Code**

**Description**

1-02-004-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL <10MMBTU/HR **
1-02-006-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Less Than 10 MMBtu/Hr
2-01-001-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Reciprocating
2-01-002-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS Reciprocating
3-01-018-63	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Extruder
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
3-15-010-02	PHOTOGRAPHIC EQUIPMENT PHOTOCOPYING EQUIPMENT MANUFACTURING Toner Classification
3-16-030-01	PHOTOGRAPHIC PRODUCT MANUFACTURING MANUFACTURING EXTRUSION OPERATIONS
3-16-030-02	PHOTOGRAPHIC PRODUCT MANUFACTURING

New York State Department of Environmental Conservation  
Permit Review Report



Permit ID: 8-2614-00205/01801  
Renewal Number: 1  
08/19/2013

3-16-040-01	MANUFACTURING FILM SUPPORT OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING CHEMICAL MANUFACTURING
3-16-040-02	CHEMICAL MANUFACTURING PHOTOGRAPHIC PRODUCT MANUFACTURING CHEMICAL MANUFACTURING
3-16-040-03	ELMUSION MAKING OPERATION PHOTOGRAPHIC PRODUCT MANUFACTURING CHEMICAL MANUFACTURING
3-16-050-01	CHEMICAL MIXING OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING SURFACE TREATMENTS
3-16-050-02	SURFACE COATING OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING SURFACE TREATMENTS
3-16-050-03	GRID IONZERS PHOTOGRAPHIC PRODUCT MANUFACTURING SURFACE TREATMENTS
3-16-050-04	CORONA DISCHARGE TREATMENT PHOTOGRAPHIC PRODUCT MANUFACTURING SURFACE TREATMENTS
3-16-120-01	PHOTOGRAPHIC DRYING OPERATIONS` PHOTOGRAPHIC PRODUCT MANUFACTURING CLEANING OPERATIONS
3-16-120-02	TANK CLEANING OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING CLEANING OPERATIONS
3-16-120-03	GENERAL CLEANING OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING CLEANING OPERATIONS
3-16-130-01	PARTS CLEANING OPERATION PHOTOGRAPHIC PRODUCT MANUFACTURING STORAGE OPERATIONS
3-16-130-02	SOLVENT STORAGE OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING STORAGE OPERATIONS
3-16-150-03	GENERAL STORAGE OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING RECOVERY OPERATIONS
3-16-160-01	DISTILLATION OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING OTHER OPERATIONS
3-16-160-02	GENERAL VENTILATION - MANUFACTURING AREAS PHOTOGRAPHIC PRODUCT MANUFACTURING OTHER OPERATIONS
3-16-160-03	GENERAL PROCESS TANK OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING OTHER OPERATIONS
3-16-160-06	MISCELLANEOUS MANUFACTURING - OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING OTHER OPERATIONS
4-01-003-36	CHEMICAL WEIGHING OPERATIONS ORGANIC SOLVENT EVAPORATION COLD SOLVENT CLEANING/STRIPPING
4-05-005-01	Entire Unit PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Gravure - 2754
5-03-005-06	SOLID WASTE DISPOSAL - INDUSTRIAL SOLID WASTE DISPOSAL: INDUSTRIAL - INCINERATION Sludge

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



**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**Facility Emissions Summary**

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000092-52-4	1, 1 BIPHENYL		>= 10 tpy
000079-34-5	1,1,2,2-TETRACHLOROETHANE		>= 10 tpy
000057-14-7	1,1-DIMETHYL HYDRAZINE		>= 10 tpy
000120-82-1	1,2,4-TRICHLOROBENZENE		>= 10 tpy
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER		>= 10 tpy
000120-80-9	1,2-BENZENEDIOL		>= 10 tpy
000107-06-2	1,2-DICHLOROETHANE		>= 10 tpy
000107-21-1	1,2-ETHANEDIOL		>= 10 tpy
000108-38-3	1,3 DIMETHYL BENZENE		>= 10 tpy
000095-80-7	1,3-BENZENEDIAMINE, 4-METHYL-		>= 10 tpy
000106-99-0	1,3-BUTADIENE		>= 10 tpy
000126-99-8	1,3-BUTADIENE, 2-CHLORO-		>= 10 tpy
000497-26-7	1,3-DIOXOLANE,2-METHYL- C4H8O2		>= 250 tpy but < 75,000 tpy
000085-44-9	1,3-ISOBENZOFURANDIONE		>= 10 tpy
000123-31-9	1,4-BENZENEDIOL		>= 10 tpy
000123-91-1	1,4-DIETHYLENE DIOXIDE		>= 10 tpy
000063-25-2	1-NAPHTHALENOL, METHYLCARBAMATE		>= 10 tpy
000098-86-2	1-PHENYLETHANONE		>= 10 tpy
000542-75-6	1-PROPENE, 1,3-DICHLORO-		>= 10 tpy
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN		>= 10 tpy
000563-79-1	2,3-DIMETHYL-2-BUTENE		>= 250 tpy but < 75,000 tpy
000121-14-2	2,4, DINITRO TOLUENE		>= 10 tpy
000051-28-5	2,4, DINITROPHENOL		>= 10 tpy
000088-06-2	2,4,6 TRICHLOROPHENOL		>= 10 tpy
000094-75-7	2,4-		>= 10 tpy

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



**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

	DICHLOROPHENOXYACETI C ACID	
000108-31-6	2,5 - FURANDIONE	>= 10 tpy
000053-96-3	2-	>= 10 tpy
000078-59-1	ACETYLAMINOFLUORENE 2-CYCLOHEXEN-1-	>= 10 tpy
000109-86-4	ONE,3,5,5-TRIMETHYL 2-METHOXYETHANOL	>= 10 tpy
000095-48-7	2-METHYL-PHENOL	>= 10 tpy
000107-87-9	2-PENTANONE	>= 250 tpy but < 75,000 tpy
000108-10-1	2-PENTANONE, 4-METHYL	>= 10 tpy
000075-31-0	2-PROPANAMINE	>= 250 tpy but < 75,000 tpy
000079-10-7	2-PROPENOIC ACID	>= 10 tpy
000141-32-2	2-PROPENOIC ACID, BUTYL ESTER	>= 2.5 tpy but < 10 tpy
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER	>= 10 tpy
000096-33-3	2-PROPENOIC ACID, METHYL ESTER	>= 250 tpy but < 75,000 tpy
000091-94-1	3,3'-DICHLOROENZIDINE	>= 10 tpy
000119-90-4	3,3'- DIMETHOXYENZIDINE	>= 10 tpy
000107-05-1	3-CHLORO-1-PROPENE	>= 10 tpy
000101-77-9	4,4'- DIAMINODIPHENYLMETH ANE	>= 10 tpy
000101-14-4	4,4-METHYLENE BIS(2- CHLOROANILINE)	>= 10 tpy
00NY502-00-0	40 CFR 60-63 - TOTAL ORGANIC COMPOUNDS (TOC)	>= 250 tpy but < 75,000 tpy
000060-11-7	4- DIMETHYLAMINOAZOBEN ZENE	>= 10 tpy
000123-42-2	4-HYDROXY-4-METHYL-2- PENTANONE	>= 250 tpy but < 75,000 tpy
000075-07-0	ACETALDEHYDE	>= 10 tpy
000060-35-5	ACETAMIDE	>= 10 tpy
000064-19-7	ACETIC ACID	>= 50 tpy but < 100 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER	>= 10 tpy
000109-60-4	ACETIC ACID PROPYL ESTER	>= 250 tpy but < 75,000 tpy
000079-11-8	ACETIC ACID, CHLORO	>= 10 tpy
000079-20-9	ACETIC ACID, METHYL ESTER	>= 250 tpy but < 75,000 tpy
000075-05-8	ACETONITRILE	>= 10 tpy
000075-36-5	ACETYL CHLORIDE	>= 250 tpy but < 75,000 tpy
000107-02-8	ACROLEIN	>= 10 tpy
000532-27-4	ALPHA- CHLOROACETOPHENONE	>= 10 tpy
007664-41-7	AMMONIA	>= 250 tpy but < 75,000 tpy
000062-53-3	ANILINE	>= 10 tpy
007440-36-0	ANTIMONY	>= 10 tpy
007440-38-2	ARSENIC	>= 10 tpy
000075-55-8	AZIRIDINE, 2-METHYL	>= 10 tpy
007440-39-3	BARIUM	>= 250 tpy but < 75,000 tpy
000114-26-1	BAYGON	>= 10 tpy
000090-04-0	BENZENAMINE, 2- METHOXY	>= 10 tpy
000095-53-4	BENZENAMINE, 2-METHYL	>= 10 tpy
000121-69-7	BENZENAMINE, N, N- DIMETHYL	>= 10 tpy
000071-43-2	BENZENE	>= 10 tpy

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



**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

000098-82-8	BENZENE, (1-METHYLETHYL)	>= 10 tpy
000072-55-9	BENZENE, 1,1'-(DICHLOROETHENYLIDENE)BIS[4-CHLORO-	>= 10 tpy
000106-46-7	BENZENE, 1,4-DICHLORO-	>= 10 tpy
000584-84-9	BENZENE, 2,4-DIISOCYANATO-1-METHYL-	>= 10 tpy
001321-74-0	BENZENE, DIETHENYL-	>= 250 tpy but < 75,000 tpy
000098-07-7	BENZENE, TRICHLOROMETHYL	>= 10 tpy
000095-47-6	BENZENE, 1,2-DIMETHYL	>= 10 tpy
000100-44-7	BENZYL CHLORIDE	>= 10 tpy
007440-41-7	BERYLLIUM	>= 10 tpy
000057-57-8	BETA-PROPIOLACTONE	>= 10 tpy
000117-81-7	BIS(2-ETHYLHEXYL)PHTHALATE	>= 10 tpy
007726-95-6	BROMINE	> 0 but < 2.5 tpy
000075-25-2	BROMOFORM	>= 10 tpy
000109-74-0	BUTANENITRILE C4H7N	>= 2.5 tpy but < 10 tpy
000105-45-3	BUTANOIC ACID, 3-OXO-, METHYL ESTER	>= 250 tpy but < 75,000 tpy
000071-36-3	BUTANOL	>= 10 tpy but < 25 tpy
007440-43-9	CADMIUM	>= 10 tpy
007440-70-2	CALCIUM	>= 250 tpy but < 75,000 tpy
000133-06-2	CAPTAN	>= 10 tpy
000051-79-6	CARBAMIC ACID, ETHYL ESTER	>= 10 tpy
000079-44-7	CARBAMIC CHLORIDE, DIMETHYL	>= 10 tpy
000075-15-0	CARBON DISULFIDE	>= 10 tpy
000630-08-0	CARBON MONOXIDE	>= 250 tpy but < 75,000 tpy
000056-23-5	CARBON TETRACHLORIDE	>= 10 tpy
000463-58-1	CARBONYL SULFIDE	>= 10 tpy
000133-90-4	CHLORAMBEN	>= 10 tpy
000057-74-9	CHLORDANE	>= 10 tpy
007782-50-5	CHLORINE	>= 10 tpy
000108-90-7	CHLORO BENZENE	>= 10 tpy
000067-66-3	CHLOROFORM	>= 10 tpy
007440-47-3	CHROMIUM	>= 10 tpy
018540-29-9	CHROMIUM(VI)	> 0 but < 10 tpy
007440-48-4	COBALT	>= 10 tpy
007440-50-8	COPPER	>= 250 tpy but < 75,000 tpy
001319-77-3	CRESYLIC ACID	>= 10 tpy
000156-62-7	CYANAMIDE, CALCIUM SALT (1:1)	>= 10 tpy
000057-12-5	CYANIDE	>= 10 tpy
000110-82-7	CYCLOHEXANE	>= 250 tpy but < 75,000 tpy
000334-88-3	DIAZOMETHANE	>= 10 tpy
000132-64-9	DIBENZOFURAN	>= 10 tpy
000075-09-2	DICHLOROMETHANE	>= 10 tpy
000096-22-0	DIETHYL KETONE	> 0 but < 2.5 tpy
000131-11-3	DIMETHYL PHTHALATE	>= 10 tpy
000067-64-1	DIMETHYL KETONE	>= 250 tpy but < 75,000 tpy
000067-68-5	DIMETHYL SULFOXIDE	> 0 but < 2.5 tpy
000646-06-0	DIOXACYCLOPENTANE, 1,3-	> 0 but < 2.5 tpy
000075-04-7	ETHANAMINE	>= 250 tpy but < 75,000 tpy
000109-89-7	ETHANAMINE, N-ETHYL	> 0 but < 2.5 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO	>= 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO	>= 10 tpy
000075-34-3	ETHANE, 1,1-DICHLORO-	>= 10 tpy
000111-44-4	ETHANE, 1,1'-OXYBIS 2-	>= 10 tpy



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

	CHLORO	
000106-93-4	ETHANE, 1,2-DIBROMO	>= 10 tpy
000075-00-3	ETHANE, CHLORO	>= 10 tpy
025154-53-4	ETHANE, DIMETHOXY	>= 250 tpy but < 75,000 tpy
000067-72-1	ETHANE, HEXACHLORO	>= 10 tpy
000540-67-0	ETHANE, METHOXY-	>= 250 tpy but < 75,000 tpy
000111-42-2	ETHANOL, 2,2'-IMINOBIS-	>= 10 tpy
000075-35-4	ETHENE, 1,1-DICHLORO	>= 10 tpy
000510-15-6	ETHYL 4,4'- DICHLOROBENZILATE	>= 10 tpy
000141-78-6	ETHYL ACETATE	>= 250 tpy but < 75,000 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)	>= 250 tpy but < 75,000 tpy
000106-88-7	ETHYL OXIRANE	>= 10 tpy
000100-41-4	ETHYLBENZENE	>= 10 tpy
000079-06-1	ETHYLENE CARBOXAMIDE	>= 10 tpy
000075-21-8	ETHYLENE OXIDE	>= 10 tpy
000096-45-7	ETHYLENE THIOUREA	>= 10 tpy
000151-56-4	ETHYLENEIMINE	>= 10 tpy
016984-48-8	FLUORIDE	>= 250 tpy but < 75,000 tpy
000050-00-0	FORMALDEHYDE	>= 10 tpy
000068-12-2	FORMAMIDE, N,N- DIMETHYL	>= 10 tpy
008006-61-9	GASOLINE	>= 250 tpy but < 75,000 tpy
000076-44-8	HEPTACHLOR	>= 10 tpy
000118-74-1	HEXACHLOROBENZENE	>= 10 tpy
000087-68-3	HEXACHLOROBUTADIENE	>= 10 tpy
000077-47-4	HEXACHLOROCYCLOPENT ADIENE	>= 10 tpy
000110-54-3	HEXANE	>= 10 tpy
000822-06-0	HEXANE, 1,6- DIISOCYANATO-	>= 10 tpy
000302-01-2	HYDRAZINE	>= 10 tpy
010035-10-6	HYDROGEN BROMIDE	>= 250 tpy but < 75,000 tpy
007647-01-0	HYDROGEN CHLORIDE	>= 10 tpy
007664-39-3	HYDROGEN FLUORIDE	>= 10 tpy
007783-06-4	HYDROGEN SULFIDE	>= 250 tpy but < 75,000 tpy
007553-56-2	IODINE	>= 250 tpy but < 75,000 tpy
000078-83-1	ISOBUTYL ALCOHOL	>= 250 tpy but < 75,000 tpy
000078-84-2	ISOBUTYRIC ALDEHYDE	> 0 but < 2.5 tpy
000108-21-4	ISOPROPYL ACETATE	>= 250 tpy but < 75,000 tpy
000067-63-0	ISOPROPYL ALCOHOL	>= 250 tpy but < 75,000 tpy
000108-20-3	ISOPROPYL ETHER	>= 2.5 tpy but < 10 tpy
007439-92-1	LEAD	>= 10 tpy
000058-89-9	LINDANE, GAMMA	>= 10 tpy
007439-96-5	MANGANESE	>= 10 tpy
007439-97-6	MERCURY	>= 10 tpy
000062-75-9	METHANAMINE, N- METHYL-N-NITROSO	>= 10 tpy
000074-82-8	METHANE	>= 250 tpy but < 75,000 tpy
000542-88-1	METHANE, OXYBIS (CHLORO)	>= 10 tpy
000072-43-5	METHOXYCHLOR	>= 10 tpy
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER	>= 10 tpy
000067-56-1	METHYL ALCOHOL	>= 10 tpy
000074-89-5	METHYL AMINE	>= 2.5 tpy but < 10 tpy
000074-83-9	METHYL BROMIDE	>= 10 tpy
000074-87-3	METHYL CHLORIDE	>= 10 tpy
000107-30-2	METHYL CHLOROMETHYLEETHER	>= 10 tpy
000078-93-3	METHYL ETHYL KETONE	>= 10 tpy
000060-34-4	METHYL HYDRAZINE	>= 10 tpy
000074-88-4	METHYL IODIDE	>= 10 tpy

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



**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

000624-83-9	METHYL ISOCYANATE	>= 10 tpy
001634-04-4	METHYL TERTBUTYL ETHER	>= 10 tpy
000101-68-8	METHYLENE BISPHENYL ISOCYANATE	>= 10 tpy
000121-44-8	N,N-DIETHYL ETHANAMINE	>= 10 tpy
000091-20-3	NAPHTHALENE	>= 10 tpy
000544-16-1	N-BUTYL NITRATE	> 0 but < 2.5 tpy
000142-82-5	N-HEPTANE	>= 250 tpy but < 75,000 tpy
0NY059-28-0	NICKEL (NI 059)	>= 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	>= 10 tpy
000098-95-3	NITROBENZENE	>= 10 tpy
000059-89-2	NITROSOMORPHOLINE	>= 10 tpy
000684-93-5	NITROSO-N-METHYLUREA	>= 10 tpy
000119-93-7	O-TOLIDINE	>= 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy but < 75,000 tpy
000106-89-8	OXIRANE, (CHLOROMETHYL)	>= 10 tpy
000092-67-1	P-AMINODIPHENYL	>= 10 tpy
000100-02-7	PARA-NITROPHENOL	>= 10 tpy
0NY075-00-0	PARTICULATES	>= 250 tpy but < 75,000 tpy
000082-68-8	PENTACHLORONITROBEN ZENE	>= 10 tpy
000540-84-1	PENTANE, 2,2,4- TRIMETHYL-	>= 10 tpy
000127-18-4	PERCHLOROETHYLENE	>= 10 tpy
000108-95-2	PHENOL	>= 10 tpy
000534-52-1	PHENOL, 2-METHYL-4,6- DINITRO	>= 10 tpy
000108-39-4	PHENOL, 3-METHYL	>= 10 tpy
000106-44-5	PHENOL, 4-METHYL	>= 10 tpy
000087-86-5	PHENOL, PENTACHLORO	>= 10 tpy
000075-44-5	PHOSGENE	>= 10 tpy
007803-51-2	PHOSPHINE	>= 10 tpy
000062-73-7	PHOSPHORIC ACID, 2,2- DICHLOROETHENYL DIMETHYL ESTER	>= 10 tpy
000680-31-9	PHOSPHORIC TRIAMIDE, HEXAMETHYL	>= 10 tpy
000056-38-2	PHOSPHOROTHIOIC ACID, O,O-DIETHYL O-(4- NITROPHENYL) ESTER	>= 10 tpy
007723-14-0	PHOSPHORUS (YELLOW)	>= 10 tpy
010025-87-3	PHOSPHORUS OXYCHLORIDE	>= 250 tpy but < 75,000 tpy
0NY075-00-5	PM-10	>= 250 tpy but < 75,000 tpy
001336-36-3	POLYCHLORINATED BIPHENYL	>= 10 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS	>= 10 tpy
007440-09-7	POTASSIUM K	>= 250 tpy but < 75,000 tpy
000106-50-3	P-PHENYLENEDIAMINE	>= 10 tpy
001120-71-4	PROPANE SULTONE	>= 10 tpy
000096-12-8	PROPANE, 1,2-DIBROMO-3- CHLORO	>= 10 tpy
000078-87-5	PROPANE, 1,2-DICHLORO	>= 10 tpy
000075-56-9	PROPANE, 1,2-EPOXY-	>= 10 tpy
000079-46-9	PROPANE, 2-NITRO	>= 10 tpy
000071-23-8	PROPANOL	>= 250 tpy but < 75,000 tpy
000107-13-1	PROPENENITRILE	>= 10 tpy
000123-38-6	PROPIONALDEHYDE	>= 10 tpy
000110-86-1	PYRIDINE	>= 10 tpy but < 25 tpy



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

000091-22-5	QUINOLINE	>= 10 tpy
000106-51-4	QUINONE	>= 10 tpy
0NY220-86-0	RADON (RN 220)	>= 10 tpy but < 25 tpy
007782-49-2	SELENIUM	>= 10 tpy
007440-23-5	SODIUM	>= 250 tpy but < 75,000 tpy
000100-42-5	STYRENE	>= 10 tpy
000096-09-3	STYRENE OXIDE	>= 10 tpy
007704-34-9	SULFUR	>= 250 tpy but < 75,000 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy but < 75,000 tpy
007664-93-9	SULFURIC ACID	>= 250 tpy but < 75,000 tpy
000064-67-5	SULFURIC ACID, DIETHYL ESTER	>= 10 tpy
000077-78-1	SULFURIC ACID, DIMETHYL ESTER	>= 10 tpy
007791-25-5	SULFURYL CHLORIDE	> 0 but < 2.5 tpy
000109-99-9	TETRAHYDROFURAN	>= 250 tpy but < 75,000 tpy
007719-09-7	THIONYL CHLORIDE	> 0 but < 2.5 tpy
007550-45-0	TITANIUM TETRACHLORIDE	>= 10 tpy
000108-88-3	TOLUENE	>= 10 tpy
0NY100-00-0	TOTAL HAP	>= 250 tpy but < 75,000 tpy
008001-35-2	TOXAPHENE	>= 10 tpy
000079-01-6	TRICHLOROETHYLENE	>= 10 tpy
000095-95-4	TRICHLOROPHENOL, 2,4,5	>= 10 tpy
001582-09-8	TRIFLURALIN	>= 10 tpy
000593-60-2	VINYL BROMIDE	>= 10 tpy
000075-01-4	VINYL CHLORIDE	>= 10 tpy
0NY998-00-0	VOC	>= 250 tpy but < 75,000 tpy
001330-20-7	XYLENE, M, O & P MIXT.	>= 10 tpy
000106-42-3	XYLENE, PARA-	>= 10 tpy
007440-66-6	ZINC	>= 250 tpy but < 75,000 tpy

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
  - (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.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

Reopenings shall not be initiated before a notice of such intent is provided to



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**Item L: Permit Exclusion - ECL 19-0305**

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

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

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**

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

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

**Regulatory Analysis**

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
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**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

FACILITY	ECL 19-0301	598, 599	Powers and Duties of the Department with respect to air
U-00024	40CFR 60-A	308	pollution control
U-00024/-/E63/351AP	40CFR 60-Dc.48c (g)	324	General provisions
			Reporting and Recordkeeping Requirements.
U-00024/-/E63/351AP	40CFR 60-Dc.48c (i)	325	Reporting and Recordkeeping Requirements.
U-00008/-/K02	40CFR 61-A	95	General Provisions - applicability of part 61
U-00008/-/K02	40CFR 61-E.52 (b)	96	Standard for Mercury: Mercury Ore Processing, chlorine gas production, and sludge incineration-emission standard
U-00008/-/K02	40CFR 61-E.54 (e)	97	Standard for Mercury: Mercury Ore Processing, chlorine gas production, and sludge incineration-sludge sampling
U-00008/-/K02	40CFR 61-E.55 (a)	98	Standard for Mercury: monitoring of emissions and operations
FACILITY	40CFR 61-FF.342 (a)	43	Benzene Emissions from Benzene waste operations - standards: general
FACILITY	40CFR 61-FF.356 (a)	44	Benzene Emissions from Benzene waste operations - recordkeeping requirements
FACILITY	40CFR 61-FF.356 (b) (1)	45	Benzene Emissions from Benzene waste operations - recordkeeping requirements
FACILITY	40CFR 61-FF.357 (a)	46	Benzene Emissions from Benzene waste operations - reporting reqts
FACILITY	40CFR 61-FF.357 (b)	47	Benzene Emissions from Benzene waste operations - reporting reqts
FACILITY	40CFR 61-M	42	Asbestos standards for: asbestos mills, manufacturing operations using asbestos, and other sources
U-00020/-/N04	40CFR 63-BBBBB.7184 (b)	240	Process vents: organic HAP emissions
U-00020/-/N05	40CFR 63-BBBBB.7184 (c)	241	Process vent: inorganic HAP emissions
U-00020/-/N06	40CFR 63-	242	Process Vents -

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

	BBBBB.7184 (f)		Combined HAP emissions
U-00020	40CFR 63- BBBBB.7190 (a) (	235	Periodic compliance reports.
U-00020	40CFR 63- BBBBB.7190 (a) (	236	Immediate startup, shutdown, and malfunction report.
U-00020	40CFR 63- BBBBB.7191 (a) (	237	Notification and report requirement submittals
U-00020	40CFR 63- BBBBB.7191 (a) (	238	Startup, shutdown, and malfunctions records
U-00020	40CFR 63-BBBBB.7193	239	General provision applicability.
U-00008	40CFR 63-DD.680 (f)	91, 92	NESHAP for Offsite Waste and Recovery Operations - general provisions applicability
U-00008	40CFR 63- DD.683 (b) (2) (i	93	NESHAP for Offsite Waste and Recovery Operations - General Standards
U-00008	40CFR 63-EEE.1200 (c)	94	Hazardous Waste Combustors - General Provisions
U-00008/09503	40CFR 63-EEE.1206 (c)	107	Operating requirements
U-00008/09503	40CFR 63- EEE.1206 (c) (2)	108	Hazardous Waste Combustor NESHAP - Startup/Shutdown/Malf
U-00008/-/K02	40CFR 63- EEE.1206 (c) (3)	99	unction Plan Hazardous Waste Combustor NESHAP - Automatic Waste Feed Cutoff (AWFCO)
U-00008/09503	40CFR 63- EEE.1206 (c) (3)	109, 110, 111	requirements Hazardous Waste Combustor NESHAP - Automatic Waste Feed Cutoff (AWFCO)
U-00008/09503	40CFR 63- EEE.1206 (c) (4)	112, 113, 114, 115	requirements Hazardous Waste Combustor NESHAP - Emergency Safety Vent Openings
U-00008/09503	40CFR 63- EEE.1206 (c) (5)	116	Hazardous Waste Combustor NESHAP - Combustion system leaks
U-00008/09503	40CFR 63- EEE.1206 (c) (6)	117, 118, 119, 120	Hazardous Waste Combustor NESHAP - Operator training and certification
U-00008/09503	40CFR 63- EEE.1206 (c) (7)	121	Hazardous Waste Combustor NESHAP - Operation and maintenance plan
U-00008/09503	40CFR 63-EEE.1207	122, 123	Performance Test Requirements
U-00008/09503	40CFR 63- EEE.1207 (j) (1)	124	Hazardous Waste Combustor NESHAP - Notification of



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

U-00008/09503	40CFR 63- EEE.1207(j) (2)	125	Compliance for comprehensive performance testing Hazardous Waste Combustor NESHAP - Notification of compliance for confirmatory performance testing
U-00008/09503	40CFR 63-EEE.1207(1)	126, 127	Hazardous Waste Combustor NESHAP - failure of performance test
U-00008/09503	40CFR 63- EEE.1209(a) (2)	128	Hazardous Waste Combustor NESHAP - performance specifications
U-00008/-/K02	40CFR 63- EEE.1209(a) (6)	100	Hazardous Waste Combustor NESHAP - Calculation of rolling averages
U-00008/09503	40CFR 63-EEE.1209(b)	129	CMS monitoring requirements
U-00008/-/K02	40CFR 63- EEE.1209(b) (5)	101	Hazardous Waste Combustor NESHAP - Calculation of rolling averages for continuous monitoring systems
U-00008/09503	40CFR 63- EEE.1209(c) (2)	130	Hazardous Waste Combustor NESHAP - Feedstream analysis plan
U-00008/09503	40CFR 63- EEE.1209(g) (2)	131, 132, 133, 134, 135, 136	Hazardous Waste Combustor NESHAP - Alternative Monitoring Requirements
U-00008/09503	40CFR 63- EEE.1209(k) (2)	137, 138	Hazardous Waste Combustor NESHAP - D/F monitoring parameters - Min. combustion chamber temperature
U-00008/09503	40CFR 63- EEE.1209(k) (4)	139	Hazardous Waste Combustor NESHAP - Dioxin/Furan monitoring - max. hazardous waste feedrate
U-00008/09503	40CFR 63- EEE.1209(l) (1)	140	Hazardous Waste Combustor NESHAP - Mercury monitoring - feedrate of total mercury limit
U-00008/09503	40CFR 63- EEE.1209(l) (2)	141	Hazardous Waste Combustor NESHAP - Mercury monitoring - wet scrubber limit
U-00008/09503	40CFR 63- EEE.1209(m) (1)	142	Hazardous Waste Combustor NESHAP - PM monitoring - high energy wet scrubber monitoring



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

U-00008/09503	40CFR 63- EEE.1209(m) (1)	143, 144	Hazardous Waste Combustion NESHAP - Monitoring Standards - PM operating parameter limits for wet scrubbers
U-00008/09503	40CFR 63- EEE.1209(m) (1)	145, 146	Hazardous Waste Combustor NESHAP - PM monitoring - high energy wet scrubbers
U-00008/09503	40CFR 63- EEE.1209(m) (3)	147	Hazardous Waste Combustion NESHAP - Monitoring Standards - PM maximum ash feedrate
U-00008/09503	40CFR 63- EEE.1209(n) (2)	148, 149	Hazardous Waste Combustion NESHAP - Monitoring Standards - semivolatile and low volatility metals - maximum feedrate of metal
U-00008/09503	40CFR 63- EEE.1209(o) (1)	150	Hazardous Waste Combustor NESHAP - Hydrochloric acid and chlorine gas monitoring provisions
U-00008/09503	40CFR 63- EEE.1209(o) (3)	151	Hazardous Waste Combustor NESHAP - Hydrochloric acid and chlorine gas monitoring provisions
U-00008/09503	40CFR 63- EEE.1209(o) (3)	152	Hazardous Waste Combustor NESHAP - Hydrochloric acid and chlorine gas monitoring provisions
U-00008/09503	40CFR 63- EEE.1209(o) (3)	153	Hazardous Waste Combustor NESHAP - Hydrochloric acid and chlorine gas monitoring provisions
FACILITY	40CFR 63-EEE.1211(a)	51, 52, 53	Hazardous Waste Combustion NESHAP - Recordkeeping and Reporting Requirements
U-00008/09503	40CFR 63-EEE.1211(b)	154	Hazardous Waste Combustor NESHAP - Recordkeeping requirements
U-00008/09503	40CFR 63-EEE.1219(a)	155, 156	Hazardous Waste Combustion NESHAP - Replacement Standards - Emission limits for existing sources
U-00021	40CFR 63-EEEE.2342(b)	245	Compliance dates for existing affected sources
U-00009	40CFR 63-EEEE.2343	163	Requirements for emission sources not requiring control
U-00021	40CFR 63-EEEE.2343	246	Requirements for emission sources not



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

U-00021/14201/H80	40CFR 63-EEEE.2346 (a)	289	requiring control Emission limitations, operating limits, and work practice standards
U-00021	40CFR 63-EEEE.2346 (c)	247	Compliance requirements for equipment leaks
U-00021	40CFR 63-EEEE.2350	248	General compliance requirements
U-00021	40CFR 63-EEEE.2378	249	Requirements for demonstrating continuous compliance with emission limits, operating limits and work practice standards
FACILITY	40CFR 63-EEEE.2386	54	Reporting requirements
U-00009	40CFR 63-EEEE.2390	164	Records that must be maintained
U-00021	40CFR 63-EEEE.2390	250	Records that must be maintained
U-00009	40CFR 63-EEEE.2394	165	Format and length of time records must be maintained
U-00021	40CFR 63-EEEE.2394	251	Format and length of time records must be maintained
FACILITY	40CFR 63-EEEE.2398	55	General provisions
U-00009	40CFR 63-FFFF	166, 167, 168	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
U-00021/14201/H81	40CFR 63-FFFF	290	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
U-00009	40CFR 63-FFFF.2435 (d)	169	Miscellaneous Organic Chemical Mfg NESHAP - transfer rack loading arm or storage tank requirements.
U-00021/-/H81	40CFR 63-FFFF.2435 (d)	252	Miscellaneous Organic Chemical Mfg NESHAP - transfer rack loading arm or storage tank requirements.
U-00009	40CFR 63-FFFF.2450 (e)	170, 171, 172, 173, 174, 175	Miscellaneous Organic Chemical Mfg NESHAP - General requirements for control devices.
U-00021/-/H81	40CFR 63-FFFF.2450 (e)	253, 254, 255, 256, 257, 258	Miscellaneous Organic Chemical Mfg NESHAP - General requirements for control devices.
U-00053	40CFR 63-FFFF.2450 (e)	406	Miscellaneous Organic Chemical Mfg NESHAP -

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00053/325X3/I35/325AP	40CFR 63-FFFF.2450 (e)	435, 436, 437	General requirements for control devices. Miscellaneous Organic Chemical Mfg NESHAP - General requirements for control devices.
U-00060	40CFR 63-FFFF.2450 (e)	469, 470, 471, 472	Miscellaneous Organic Chemical Mfg NESHAP - General requirements for control devices.
U-00053/-/I35	40CFR 63-FFFF.2450 (k) (3)	422	Miscellaneous Organic Chemical Mfg NESHAP - alternate monitoring using caustic strength of the effluent.
U-00060	40CFR 63-FFFF.2450 (k) (3)	473	Miscellaneous Organic Chemical Mfg NESHAP - alternate monitoring using caustic strength of the effluent.
U-00021/-/H81	40CFR 63-FFFF.2455 (b)	259	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Continuous Process Vents - Group 1 or TRE calculations
U-00021/-/H81	40CFR 63-FFFF.2460 (b)	260	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status
U-00025	40CFR 63-FFFF.2460 (b)	338	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status
U-00048/-/I01	40CFR 63-FFFF.2460 (b)	379	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status
U-00053/-/I35	40CFR 63-FFFF.2460 (b)	423	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status
U-00060	40CFR 63-FFFF.2460 (b)	474	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status
U-00060/304B0	40CFR 63-FFFF.2465 (a)	515, 516, 517	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Process Vents Emitting Halogens or PM - emission limits
U-00060/304X1	40CFR 63-FFFF.2465 (a)	523, 524, 525	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Process Vents Emitting Halogens or

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00025	40CFR 63-FFFF.2465 (b)	339	PM - emission limits Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - uncontrolled hydrogen halide & halogen HAP emissions.
U-00048/-/I01	40CFR 63-FFFF.2465 (b)	380	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - uncontrolled hydrogen halide & halogen HAP emissions.
U-00053/-/I35	40CFR 63-FFFF.2465 (b)	424	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - uncontrolled hydrogen halide & halogen HAP emissions.
U-00060	40CFR 63-FFFF.2465 (b)	475	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - uncontrolled hydrogen halide & halogen HAP emissions.
U-00053/325X3/I35/325AP	40CFR 63-FFFF.2465 (c) (1)	438, 439, 440	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Design evaluation for process vents.
U-00060/303X1	40CFR 63-FFFF.2465 (c) (1)	510, 511, 512	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Design evaluation for process vents.
U-00021/-/H81	40CFR 63-FFFF.2470 (a)	261	Miscellaneous Organic Chemical Mfg NESHAP - Storage Tank Provisions
U-00009	40CFR 63-FFFF.2470 (d)	176	Miscellaneous Organic Chemical Mfg NESHAP - Storage Tanks - Planned Routine Maintenance
U-00021/-/H81	40CFR 63-FFFF.2470 (d)	262	Miscellaneous Organic Chemical Mfg NESHAP - Storage Tanks - Planned Routine Maintenance
U-00021/-/H81	40CFR 63-FFFF.2475	263	Misc. Organic Chemical NESHAP
U-00009	40CFR 63-FFFF.2480	177, 178, 179, 180, 181, 182, 183, 184, 185, 186	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
U-00021/-/H81	40CFR 63-FFFF.2480	264, 265, 266, 267, 268, 269, 270, 271,	Miscellaneous Organic Chemical

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

		272	Manufacturing NESHAP (MON) - Equipment leak provisions
U-00023/-/H07	40CFR 63-FFFF.2480	294, 295, 296, 297, 298	Miscellaneous Organic Chemical
			Manufacturing NESHAP (MON) - Equipment leak provisions
U-00025	40CFR 63-FFFF.2480	340, 341, 342, 343, 344, 345, 346, 347, 348	Miscellaneous Organic Chemical
			Manufacturing NESHAP (MON) - Equipment leak provisions
U-00048/-/I01	40CFR 63-FFFF.2480	381, 382, 383, 384, 385, 386, 387	Miscellaneous Organic Chemical
			Manufacturing NESHAP (MON) - Equipment leak provisions
U-00053	40CFR 63-FFFF.2480	407, 408, 409, 410, 411, 412, 413, 414, 415	Miscellaneous Organic Chemical
			Manufacturing NESHAP (MON) - Equipment leak provisions
U-00056	40CFR 63-FFFF.2480	444, 445, 446, 447, 448, 449	Miscellaneous Organic Chemical
			Manufacturing NESHAP (MON) - Equipment leak provisions
U-00056/-/I33	40CFR 63-FFFF.2480	455	Miscellaneous Organic Chemical
			Manufacturing NESHAP (MON) - Equipment leak provisions
U-00060	40CFR 63-FFFF.2480	476, 477, 478, 479, 480, 481, 482, 483, 484	Miscellaneous Organic Chemical
			Manufacturing NESHAP (MON) - Equipment leak provisions
U-00009	40CFR 63-FFFF.2485	187, 188, 189, 190	Miscellaneous Organic Chemical
			Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00021/-/H81	40CFR 63-FFFF.2485	273, 274, 275, 276	Miscellaneous Organic Chemical
			Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00023/-/H07	40CFR 63-FFFF.2485	299, 300	Miscellaneous Organic Chemical
			Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00025	40CFR 63-FFFF.2485	349, 350, 351, 352	Miscellaneous Organic Chemical
			Manufacturing NESHAP (MON) - Req'ts for wastewater streams &

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00048/-/I01	40CFR 63-FFFF.2485	388, 389, 390, 391, 392	liquid streams in open systems. Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00053	40CFR 63-FFFF.2485	416, 417, 418	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00056	40CFR 63-FFFF.2485	450	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00056/-/I33	40CFR 63-FFFF.2485	456	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00060	40CFR 63-FFFF.2485	485, 486, 487, 488, 489	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00009	40CFR 63-FFFF.2485(j)	191	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.
U-00021/-/H81	40CFR 63-FFFF.2485(j)	277	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.
U-00023/-/H07	40CFR 63-FFFF.2485(j)	301	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.
U-00025	40CFR 63-FFFF.2485(j)	353	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.
U-00048/-/I01	40CFR 63-FFFF.2485(j)	393	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.
U-00053	40CFR 63-FFFF.2485(j)	419	Miscellaneous Organic Chemical



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

U-00060	40CFR 63-FFFF.2485 (j)	490	Manufacturing NESHAP (MON) - Wastewater streams requirements. Miscellaneous Organic Chemical
U-00089	40CFR 63-FFFF.2485 (j)	594	Manufacturing NESHAP (MON) - Wastewater streams requirements. Miscellaneous Organic Chemical
U-00009	40CFR 63-FFFF.2490	192, 193	Manufacturing NESHAP (MON) - Wastewater streams requirements. Heat exchange system requirements
U-00021/-/H81	40CFR 63-FFFF.2490	278, 279	Heat exchange system requirements
U-00025	40CFR 63-FFFF.2490	354, 355	Heat exchange system requirements
U-00053/-/I35	40CFR 63-FFFF.2490	425, 426	Heat exchange system requirements
U-00056	40CFR 63-FFFF.2490	451, 452	Heat exchange system requirements
U-00060	40CFR 63-FFFF.2490	491, 492	Heat exchange system requirements
FACILITY	40CFR 63-FFFF.2520	56	Miscellaneous Organic Chemical Mfg NESHAP - Reporting
U-00009	40CFR 63-FFFF.2525	194, 195, 196, 197	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00021/-/H81	40CFR 63-FFFF.2525	280, 281, 282, 283, 284	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00023/-/H07	40CFR 63-FFFF.2525	302, 303, 304	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00025	40CFR 63-FFFF.2525	356, 357, 358, 359	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00048/-/I01	40CFR 63-FFFF.2525	394, 395, 396	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00053	40CFR 63-FFFF.2525	420	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00053/-/I35	40CFR 63-FFFF.2525	427, 428, 429	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-	40CFR 63-FFFF.2525	441	Miscellaneous Organic

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

00053/325X3/I35/325AP			Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements Miscellaneous Organic Chemical
U-00056	40CFR 63-FFFF.2525	453, 454	Manufacturing NESHAP (MON) - Recordkeeping Requirements Miscellaneous Organic Chemical
U-00056/-/I33	40CFR 63-FFFF.2525	457, 458	Manufacturing NESHAP (MON) - Recordkeeping Requirements Miscellaneous Organic Chemical
U-00060	40CFR 63-FFFF.2525	493, 494, 495, 496, 497	Manufacturing NESHAP (MON) - Recordkeeping Requirements Miscellaneous Organic Chemical
U-00089	40CFR 63-FFFF.2525	595, 596, 597	Manufacturing NESHAP (MON) - Recordkeeping Requirements Miscellaneous Organic Chemical
U-00009/-/H12	40CFR 63-FFFF.2535 (h)	199	Manufacturing NESHAP (MON) - Recordkeeping Requirements Miscellaneous Organic Chemical
U-00009/-/H12	40CFR 63-FFFF.2535 (k)	200	Manufacturing NESHAP (MON) - Compliance with other regulations Miscellaneous Organic Chemical
FACILITY	40CFR 63-FFFF.2535 (l)	57	Manufacturing NESHAP (MON) - Compliance with other regulations Miscellaneous Organic Chemical
FACILITY	40CFR 63-FFFF.2540	58	Manufacturing NESHAP (MON) - Applicability of process units included in a process unit group Miscellaneous Organic Chemical Mfg NESHAP - General Provisions
U-00048/-/I50	40CFR 63- HHHHH.8000 (a)	397	Miscellaneous Coating Mfg. NESHAP - General Requirements
U-00016	40CFR 63- HHHHH.8000 (b)	233	Miscellaneous Organic Coating Mfg. NESHAP - General Requirements
U-00048/-/I50	40CFR 63-HHHHH.8015	398	Miscellaneous Coating Mfg. NESHAP - Equipment Leaks
U-00048/-/I50	40CFR 63-HHHHH.8030	399	Miscellaneous Coating Mfg. NESHAP - Heat Exchanger Provisions
FACILITY	40CFR 63- HHHHH.8075 (e)	59	Miscellaneous Coating Mfg. NESHAP - Compliance reports
FACILITY	40CFR 63-HHHHH.8095	60	Miscellaneous Coating Mfg. NESHAP - General Provisions

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

FACILITY	40CFR 63-JJJJ.3340	61	Paper and Other Web Coating NESHAP - General Requirements
FACILITY	40CFR 63-JJJJ.3370 (c)	62	Paper and Other Web Coating NESHAP - Compliance demonstration for as-applied "compliant" coating materials
FACILITY	40CFR 63-JJJJ.3400 (c) (2)	63	Paper and Other Web Coating NESHAP - Semiannual compliance report contents.
FACILITY	40CFR 63-JJJJ.3410 (a)	64	Paper and Other Web Coating NESHAP - Record keeping requirements.
U-00086	40CFR 63-KK.823	556, 557	Printing and Publishing NESHAP-standard: general
U-00084	40CFR 63-KK.829 (f)	537	Printing and Publishing NESHAP-Recordkeeping
FACILITY	40CFR 63-T.460 (b)	48	
U-00011	40CFR 63-T.460 (b)	204	
U-00011/-/E07	40CFR 63-T.462 (a) (2)	205	
U-00011/-/E07	40CFR 63-T.462 (c)	206	
U-00011/-/E07	40CFR 63-T.471 (b) (1)	207	Log of Solvent Additions and Deletions
FACILITY	40CFR 63-T.471 (b) (2)	49	Facility Wide Solvent Emission Limits
U-00011/-/E07	40CFR 63-T.471 (c)	208	Demonstration of Compliance With Facility Wide Solvent Emission Limit
FACILITY	40CFR 63-T.471 (h)	50	Reporting of Solvent Emissions
F-AC003/-/CIL	40CFR 63-ZZZZ.6602	75	Reciprocating Internal Combustion Engine (RICE) NESHAP - requirements for existing engines at major sources of HAP emissions
F-AC003/-/SIL	40CFR 63-ZZZZ.6602	84	Reciprocating Internal Combustion Engine (RICE) NESHAP - requirements for existing engines at major sources of HAP emissions
F-AC003/-/CIL	40CFR 63-ZZZZ.6625 (e)	76	Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance of engine and control device
F-AC003/-/SIL	40CFR 63-ZZZZ.6625 (e)	85	Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance of engine and control device



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

F-AC003/-/CIL	40CFR 63-ZZZZ.6625 (f)	77	Reciprocating Internal Combustion Engine (RICE) NESHAP - non-resettable hour meter for certain existing emergency engines
F-AC003/-/SIL	40CFR 63-ZZZZ.6625 (f)	86	Reciprocating Internal Combustion Engine (RICE) NESHAP - non-resettable hour meter for certain existing emergency engines
F-AC003/-/CIL	40CFR 63-ZZZZ.6625 (h)	78	Reciprocating Internal Combustion Engine (RICE) NESHAP - idling time at startup
F-AC003/-/SIL	40CFR 63-ZZZZ.6625 (h)	87	Reciprocating Internal Combustion Engine (RICE) NESHAP - idling time at startup
F-AC003/-/CIL	40CFR 63- ZZZZ.6640 (f) (1)	79	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency RICE operation
F-AC003/-/SIL	40CFR 63- ZZZZ.6640 (f) (1)	88	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency RICE operation
F-AC003/-/EHG	40CFR 63- ZZZZ.6640 (f) (2)	82	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency RICE - existing greater than 500 HP at major source of HAP
F-AC003/-/CIL	40CFR 63-ZZZZ.6655 (f)	80	Reciprocating Internal Combustion Engine (RICE) NESHAP - Recordkeeping requirements
F-AC003/-/SIL	40CFR 63-ZZZZ.6655 (f)	89	Reciprocating Internal Combustion Engine (RICE) NESHAP - Recordkeeping requirements
F-AC003	40CFR 63-ZZZZ.6665	73	Reciprocating Internal Combustion Engine (RICE) NESHAP - General provisions
U- 00060/304B0/I45/30417 FACILITY	40CFR 64	522	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 64.7	65	CAM - Operation of approved monitoring
FACILITY	40CFR 64.8	66	CAM - Quality improvement plan (QIP) requirements
FACILITY	40CFR 64.9	67	CAM - Reporting and recordkeeping

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

FACILITY	40CFR 68	20	requirements
FACILITY	40CFR 82-F	21	Chemical accident prevention provisions
FACILITY	6NYCRR 200.3	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	False Statement.
FACILITY	6NYCRR 200.7	10	Acceptable ambient air quality.
FACILITY	6NYCRR 201-1.4	600	Maintenance of equipment.
FACILITY	6NYCRR 201-1.7	11	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.8	12	Recycling and Salvage
FACILITY	6NYCRR 201-3.2 (a)	13	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.3 (a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	23, 24, 68, 69	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.5 (a) (4)	15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	2	General conditions
FACILITY	6NYCRR 201-6.5 (a) (8)	16	General conditions
FACILITY	6NYCRR 201-6.5 (c)	3	Fees
FACILITY	6NYCRR 201-6.5 (c) (2)	4	General conditions
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	17	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance schedules
FACILITY	6NYCRR 201-6.5 (f)	25, 26	Compliance Certification
U-00021	6NYCRR 201-6.5 (f) (1)	243	Operational flexibility
U-00024	6NYCRR 201-6.5 (f) (1)	306	Alternate operating scenarios
U-00048	6NYCRR 201-6.5 (f) (1)	374	Alternate operating scenarios
U-00084	6NYCRR 201-6.5 (f) (1)	529	Alternate operating scenarios
U-00085	6NYCRR 201-6.5 (f) (1)	542	Alternate operating scenarios
U-00086	6NYCRR 201-6.5 (f) (1)	551	Alternate operating scenarios
FACILITY	6NYCRR 201-6.5 (f) (6)	18	Off Permit Changes
FACILITY	6NYCRR 201-6.5 (g)	27	Permit shield
FACILITY	6NYCRR 202-1.1	19	Required emissions

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

FACILITY	6NYCRR 202-2.1	7	tests.
FACILITY	6NYCRR 202-2.5	8	Emission Statements - Applicability
FACILITY	6NYCRR 207	28	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	29	Control Measures for an Air Pollution Episode
FACILITY	6NYCRR 211.2	601	General Prohibitions - air pollution prohibited
U-00008/-/K06	6NYCRR 211.2	617	General Prohibitions - visible emissions limited.
U-00008/09503	6NYCRR 212.10(c)(3)	106	General Prohibitions - visible emissions limited.
U-00086/319C1	6NYCRR 212.10(c)(3)	580	NOx and VOC RACT required at major facilities
U-00011/053L6	6NYCRR 212.10(c)(4)(i)	216	NOx and VOC RACT required at major facilities
U-00021/12007	6NYCRR 212.10(c)(4)(i)	286	NOx and VOC RACT required at major facilities
U-00021/14201	6NYCRR 212.10(c)(4)(i)	288	NOx and VOC RACT required at major facilities
U-00008/R1601/K06	6NYCRR 212.10(c)(4)(iii)	161, 162	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00012/030N1/P04/030AW	6NYCRR 212.10(c)(4)(iii)	231	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00021/11601	6NYCRR 212.10(c)(4)(iii)	285	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00021/120A5	6NYCRR 212.10(c)(4)(iii)	287	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00024/317R6/E52	6NYCRR 212.10(c)(4)(iii)	328	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00024/317R7/E52/317CI	6NYCRR 212.10(c)(4)(iii)	331	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-	6NYCRR	371	General Process

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



**Permit ID: 8-2614-00205/01801  
Renewal Number: 1  
08/19/2013**

00047/03810/P65/038AB	212.10 (c) (4) (iii)		Emission Sources - NOx and VOC RACT required at major facilities
U- 00047/03816/P65/038AG	6NYCRR 212.10 (c) (4) (iii)	372	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00048/148X1	6NYCRR 212.10 (c) (4) (iii)	400	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00053/-/I35	6NYCRR 212.10 (c) (4) (iii)	421	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00056/304A8	6NYCRR 212.10 (c) (4) (iii)	461	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00060	6NYCRR 212.10 (c) (4) (iii)	465	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00084/308B7/G05	6NYCRR 212.10 (c) (4) (iii)	541	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00086	6NYCRR 212.10 (c) (4) (iii)	554	General Process Emission Sources - NOx and VOC RACT required at major facilities
U- 00008/09601/K06/096AA	6NYCRR 212.10 (f)	159, 160	NOx and VOC RACT required at major facilities
U-00086/319C1	6NYCRR 212.10 (f)	581	NOx and VOC RACT required at major facilities
FACILITY	6NYCRR 212.4 (a)	602	General Process Emission Sources - emissions from new sources and/or modifications
U-00008/-/K06/096AA	6NYCRR 212.4 (a)	618, 619	General Process Emission Sources - emissions from new sources and/or modifications
U-00008/09503/K02	6NYCRR 212.4 (a)	620	General Process Emission Sources - emissions from new sources and/or modifications
U-00008/R1601/K06	6NYCRR 212.4 (a)	621, 622	General Process Emission Sources - emissions from new sources and/or

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00009/322B1/H12	6NYCRR 212.4 (a)	623, 624, 625	modifications General Process Emission Sources - emissions from new sources and/or modifications
U-00011	6NYCRR 212.4 (a)	626, 627, 628, 629	General Process Emission Sources - emissions from new sources and/or modifications
U-00011/053L3	6NYCRR 212.4 (a)	630	General Process Emission Sources - emissions from new sources and/or modifications
U-00011/053L6	6NYCRR 212.4 (a)	631, 632	General Process Emission Sources - emissions from new sources and/or modifications
U-00011/053L8	6NYCRR 212.4 (a)	633	General Process Emission Sources - emissions from new sources and/or modifications
U-00021/11601	6NYCRR 212.4 (a)	634	General Process Emission Sources - emissions from new sources and/or modifications
U-00021/12007	6NYCRR 212.4 (a)	635	General Process Emission Sources - emissions from new sources and/or modifications
U-00021/120A5	6NYCRR 212.4 (a)	636	General Process Emission Sources - emissions from new sources and/or modifications
U-00021/14201	6NYCRR 212.4 (a)	637	General Process Emission Sources - emissions from new sources and/or modifications
U-00047/03816/P65/038AG	6NYCRR 212.4 (a)	641	General Process Emission Sources - emissions from new sources and/or modifications
U-00048/148X1	6NYCRR 212.4 (a)	642	General Process Emission Sources - emissions from new sources and/or modifications
U-00053/325X3	6NYCRR 212.4 (a)	643, 644	General Process Emission Sources - emissions from new sources and/or modifications
U-00056/304A8	6NYCRR 212.4 (a)	645	General Process Emission Sources - emissions from new

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00060	6NYCRR 212.4 (a)	646	sources and/or modifications General Process Emission Sources - emissions from new sources and/or modifications
U-00060/303A8	6NYCRR 212.4 (a)	647	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/303B1	6NYCRR 212.4 (a)	648	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/303X1	6NYCRR 212.4 (a)	649	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/304B0	6NYCRR 212.4 (a)	650	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/304B0/I45	6NYCRR 212.4 (a)	651	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/304X1	6NYCRR 212.4 (a)	652	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/304X2	6NYCRR 212.4 (a)	653	General Process Emission Sources - emissions from new sources and/or modifications
U-00061/01701	6NYCRR 212.4 (a)	654	General Process Emission Sources - emissions from new sources and/or modifications
U-00084	6NYCRR 212.4 (a)	655	General Process Emission Sources - emissions from new sources and/or modifications
U-00084/308B5	6NYCRR 212.4 (a)	656	General Process Emission Sources - emissions from new sources and/or modifications
U-00008/09503	6NYCRR 212.4 (b)	105	New processes
U-00008/09504/K06/095AG	6NYCRR 212.4 (c)	157	General Process Emission Sources - emissions from new processes and/or modifications
U-	6NYCRR 212.4 (c)	158	General Process

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

00008/09508/K06/095AJ			Emission Sources - emissions from new processes and/or modifications
U-00011	6NYCRR 212.4 (c)	201	General Process Emission Sources - emissions from new processes and/or modifications
U-00011/05327/E06	6NYCRR 212.4 (c)	215	General Process Emission Sources - emissions from new processes and/or modifications
U-00011/053L9/E06	6NYCRR 212.4 (c)	218	General Process Emission Sources - emissions from new processes and/or modifications
U-00012/-/P04	6NYCRR 212.4 (c)	221	General Process Emission Sources - emissions from new processes and/or modifications
U- 00012/03054/P03/030AC	6NYCRR 212.4 (c)	224	General Process Emission Sources - emissions from new processes and/or modifications
U- 00012/03055/P03/030AD	6NYCRR 212.4 (c)	225	General Process Emission Sources - emissions from new processes and/or modifications
U- 00012/03062/P03/030AH	6NYCRR 212.4 (c)	226	General Process Emission Sources - emissions from new processes and/or modifications
U- 00012/030L0/P03/030AM	6NYCRR 212.4 (c)	227	General Process Emission Sources - emissions from new processes and/or modifications
U- 00012/030L1/P03/030AN	6NYCRR 212.4 (c)	228	General Process Emission Sources - emissions from new processes and/or modifications
U- 00012/030L4/P03/030AQ	6NYCRR 212.4 (c)	229	General Process Emission Sources - emissions from new processes and/or modifications
U- 00012/030M9/P03/030AV	6NYCRR 212.4 (c)	230	General Process Emission Sources - emissions from new processes and/or modifications
U-00023	6NYCRR 212.4 (c)	292	General Process Emission Sources - emissions from new processes and/or modifications

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00023/112A1/H06/112AC	6NYCRR 212.4 (c)	305	General Process Emission Sources - emissions from new processes and/or modifications
U-00024	6NYCRR 212.4 (c)	307	General Process Emission Sources - emissions from new processes and/or modifications
U-00024/-/E52	6NYCRR 212.4 (c)	309, 310, 311	General Process Emission Sources - emissions from new processes and/or modifications
U-00024/317E7/E52/317ED	6NYCRR 212.4 (c)	326	General Process Emission Sources - emissions from new processes and/or modifications
U-00024/317F0/E52/317EG	6NYCRR 212.4 (c)	327	General Process Emission Sources - emissions from new processes and/or modifications
U-00024/317R6/E52/317CH	6NYCRR 212.4 (c)	329	General Process Emission Sources - emissions from new processes and/or modifications
U-00024/317R7/E52/317CI	6NYCRR 212.4 (c)	330	General Process Emission Sources - emissions from new processes and/or modifications
U-00024/317W3/E52/317DL	6NYCRR 212.4 (c)	332	General Process Emission Sources - emissions from new processes and/or modifications
U-00025/-/S05	6NYCRR 212.4 (c)	360	General Process Emission Sources - emissions from new processes and/or modifications
U-00032	6NYCRR 212.4 (c)	362	General Process Emission Sources - emissions from new processes and/or modifications
U-00048	6NYCRR 212.4 (c)	375	General Process Emission Sources - emissions from new processes and/or modifications
U-00053	6NYCRR 212.4 (c)	401	General Process Emission Sources - emissions from new processes and/or modifications
U-00053/325X3	6NYCRR 212.4 (c)	434	General Process Emission Sources - emissions from new processes and/or

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00056/304A8/I33	6NYCRR 212.4 (c)	463	modifications General Process Emission Sources - emissions from new processes and/or modifications
U-00060/-/I24	6NYCRR 212.4 (c)	498	General Process Emission Sources - emissions from new processes and/or modifications
U-00060/-/I25	6NYCRR 212.4 (c)	499	General Process Emission Sources - emissions from new processes and/or modifications
U-00060/-/I27/304AA	6NYCRR 212.4 (c)	500, 501	General Process Emission Sources - emissions from new processes and/or modifications
U-00060/-/I27/304AB	6NYCRR 212.4 (c)	502, 503	General Process Emission Sources - emissions from new processes and/or modifications
U-00060/-/I28	6NYCRR 212.4 (c)	504	General Process Emission Sources - emissions from new processes and/or modifications
U-00060/303A8/I26/303AE	6NYCRR 212.4 (c)	509	General Process Emission Sources - emissions from new processes and/or modifications
U-00060/304B0/I45/30410	6NYCRR 212.4 (c)	520	General Process Emission Sources - emissions from new processes and/or modifications
U-00060/304B0/I45/30411	6NYCRR 212.4 (c)	521	General Process Emission Sources - emissions from new processes and/or modifications
U-00060/337A2/I51/337AA	6NYCRR 212.4 (c)	526	General Process Emission Sources - emissions from new processes and/or modifications
U-00075/08224	6NYCRR 212.4 (c)	527	General Process Emission Sources - emissions from new processes and/or modifications
U-00084	6NYCRR 212.4 (c)	530	General Process Emission Sources - emissions from new processes and/or modifications
U-00085	6NYCRR 212.4 (c)	543	General Process Emission Sources - emissions from new

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00086	6NYCRR 212.4 (c)	552	processes and/or modifications General Process Emission Sources - emissions from new processes and/or modifications
U-00087	6NYCRR 212.4 (c)	583	General Process Emission Sources - emissions from new processes and/or modifications
U-00087/-/N10	6NYCRR 212.4 (c)	585	General Process Emission Sources - emissions from new processes and/or modifications
U-00087/349D2/N10/349CA	6NYCRR 212.4 (c)	590	General Process Emission Sources - emissions from new processes and/or modifications
U-00087/349E0/N10/349CK	6NYCRR 212.4 (c)	591	General Process Emission Sources - emissions from new processes and/or modifications
U-00087/349H4/N44/349EG	6NYCRR 212.4 (c)	592	General Process Emission Sources - emissions from new processes and/or modifications
U-00087/349H9/N44/349EL	6NYCRR 212.4 (c)	593	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.5 (d)	603	Applicable emission standards
FACILITY	6NYCRR 212.5 (e)	30	Applicable emission standards
U-00008	6NYCRR 212.6 (a)	90	General Process Emission Sources - opacity of emissions limited
U-00011	6NYCRR 212.6 (a)	202	General Process Emission Sources - opacity of emissions limited
U-00012	6NYCRR 212.6 (a)	220	General Process Emission Sources - opacity of emissions limited
U-00016	6NYCRR 212.6 (a)	232	General Process Emission Sources - opacity of emissions limited
U-00023	6NYCRR 212.6 (a)	293	General Process Emission Sources - opacity of emissions limited
U-00024/-/E52	6NYCRR 212.6 (a)	312	General Process Emission Sources - opacity of emissions

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00025/-/S05	6NYCRR 212.6 (a)	361	limited General Process Emission Sources - opacity of emissions limited
U-00032	6NYCRR 212.6 (a)	363	General Process Emission Sources - opacity of emissions limited
U-00048	6NYCRR 212.6 (a)	376	General Process Emission Sources - opacity of emissions limited
U-00053	6NYCRR 212.6 (a)	402	General Process Emission Sources - opacity of emissions limited
U-00056/304A8/I33	6NYCRR 212.6 (a)	464	General Process Emission Sources - opacity of emissions limited
U-00060/30105	6NYCRR 212.6 (a)	507	General Process Emission Sources - opacity of emissions limited
U-00075/08224	6NYCRR 212.6 (a)	528	General Process Emission Sources - opacity of emissions limited
U-00084	6NYCRR 212.6 (a)	531	General Process Emission Sources - opacity of emissions limited
U-00085	6NYCRR 212.6 (a)	544	General Process Emission Sources - opacity of emissions limited
U-00086	6NYCRR 212.6 (a)	553	General Process Emission Sources - opacity of emissions limited
U-00087	6NYCRR 212.6 (a)	584	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
F-AC001	6NYCRR 226	70	SOLVENT METAL CLEANING PROCESSES
F-AC002/-/DSL	6NYCRR 227-1.3 (a)	71	Smoke Emission Limitations.
F-AC002/-/NGS	6NYCRR 227-1.3 (a)	72	Smoke Emission Limitations.
F-AC003/-/CIL	6NYCRR 227-1.3 (a)	74	Smoke Emission Limitations.
F-AC003/-/EHG	6NYCRR 227-1.3 (a)	81	Smoke Emission Limitations.
F-AC003/-/SIL	6NYCRR 227-1.3 (a)	83	Smoke Emission Limitations.
U-00024/351C8/E63/351AP	6NYCRR 227-1.3 (a)	335	Smoke Emission Limitations.
U-00084/-/G02/308AB	6NYCRR 227-1.3 (a)	538	Smoke Emission Limitations.
U-00024/-/E63/351AP	6NYCRR 227-2.4	639	Control requirements.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

F-AC002	6NYCRR 227-2.4 (d)	604	Small boilers, small combustion turbines, and small stationary internal combustion engines.
U-00024/-/E63/351AP	6NYCRR 227-2.4 (d)	640	Small boilers, small combustion turbines, and small stationary internal combustion engines.
FACILITY	6NYCRR 228-1.1 (d)	31	Will remain subject
FACILITY	6NYCRR 228-1.1 (e) (13)	32	Low-use specialty-type operation non-applicability
U-00011/-/E08	6NYCRR 228-1.10	214	Handling, storage and disposal of VOCs
U-00024/-/E55	6NYCRR 228-1.10	317	Handling, storage and disposal of VOCs
U-00024/-/E62	6NYCRR 228-1.10	323	Handling, storage and disposal of VOCs
U-00047/-/P61	6NYCRR 228-1.10	370	Handling, storage and disposal of VOCs
U-00084	6NYCRR 228-1.10	535	Handling, storage and disposal of VOCs
U-00085/-/S21	6NYCRR 228-1.10	549	Handling, storage and disposal of VOCs
U-00011/-/E08	6NYCRR 228-1.3 (c)	209, 210	Solids as applied
U-00086/-/J50	6NYCRR 228-1.3 (c)	558	Solids as applied
U-00024/-/E62	6NYCRR 228-1.3 (d)	318	Coating system as a control strategy
U-00047/-/P61	6NYCRR 228-1.3 (d)	365	Coating system as a control strategy
U-00084/-/G10	6NYCRR 228-1.3 (e)	540	Process specific RACT demonstrations
U-00011	6NYCRR 228-1.4	203	Opacity
U-00024/-/E55	6NYCRR 228-1.4	313	Opacity
U-00024/-/E62	6NYCRR 228-1.4	319	Opacity
U-00047/-/P61	6NYCRR 228-1.4	366	Opacity
U-00084	6NYCRR 228-1.4	532	Opacity
U-00085/059K4/S21/059AX	6NYCRR 228-1.4	550	Opacity
U-00086/319C1/J50	6NYCRR 228-1.4	582	Opacity
U-00011/-/E08	6NYCRR 228-1.5 (a)	211	VOC recordkeeping by the facility
FACILITY	6NYCRR 228-1.5 (b)	33	Use of Methods 311 or 24.
FACILITY	6NYCRR 228-1.5 (c)	34	Alternate sampling and analysis methods
FACILITY	6NYCRR 228-1.5 (d)	35	Department Access to Obtain Samples
U-00011/053L6/E08	6NYCRR 228-1.5 (g) (3)	217	Breakthrough of VOC on carbon unit
FACILITY	6NYCRR 228-1.5 (j)	36	Record of noncompliance
U-00011/-/E08	6NYCRR 228-1.6 (a)	212	Prohibition of Sale
U-00024/-/E55	6NYCRR 228-1.6 (a)	314	Prohibition of Sale
U-00024/-/E62	6NYCRR 228-1.6 (a)	320	Prohibition of Sale
U-00047/-/P61	6NYCRR 228-1.6 (a)	367	Prohibition of Sale
U-00084	6NYCRR 228-1.6 (a)	533	Prohibition of Sale
U-00085/-/S21	6NYCRR 228-1.6 (a)	546	Prohibition of Sale
U-00011/-/E08	6NYCRR 228-1.6 (b)	213	Prohibition of Specification
U-00024/-/E55	6NYCRR 228-1.6 (b)	315	Prohibition of Specification



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

**Permit ID: 8-2614-00205/01801  
Renewal Number: 1  
08/19/2013**

U-00024/-/E62	6NYCRR 228-1.6 (b)	321	Prohibition of Specification
U-00047/-/P61	6NYCRR 228-1.6 (b)	368	Prohibition of Specification
U-00084	6NYCRR 228-1.6 (b)	534	Prohibition of Specification
U-00085/-/S21	6NYCRR 228-1.6 (b)	547	Prohibition of Specification
U-00024/-/E55	6NYCRR 228-1.7	316	Table 1
U-00024/-/E62	6NYCRR 228-1.7	322	Table 1
U-00047/-/P61	6NYCRR 228-1.7	369	Table 1
U-00084/-/G08	6NYCRR 228-1.7	539	Table 1
U-00085/-/S21	6NYCRR 228-1.7	548	Table 1
F-AC004/-/AD1	6NYCRR 228-2.3 (e)	606	Adhesives applied to substrates
F-AC004/-/AD1	6NYCRR 228-2.3 (f) (1)	607	Surface preparation solvent
F-AC004/-/AD1	6NYCRR 228-2.3 (f) (3)	608	Cleanup solvent
F-AC004/-/AD1	6NYCRR 228-2.3 (f) (4)	609	Spray application equipment
F-AC004/-/AD1	6NYCRR 228-2.3 (h)	610	Required VOC controls for Industrial adhesive processes emitting 3 tons per year or more.
F-AC004/-/AD1	6NYCRR 228-2.3 (i)	611	No person shall solicit, require the use or specify the application of noncomplaint products.
F-AC004	6NYCRR 228-2.4	605	Exemptions and Exceptions
F-AC004/-/AD2	6NYCRR 228-2.4	614	Exemptions and Exceptions
F-AC004/-/AD1	6NYCRR 228-2.5 (a)	612	Recordkeeping requirements for 228-2.3
F-AC004/-/AD3	6NYCRR 228-2.5 (d)	616	Laboratory exemption requirements
F-AC004/-/AD1	6NYCRR 228-2.7 (b)	613	Container Labeling
F-AC004/-/AD2	6NYCRR 228-2.7 (b)	615	Container Labeling
U-00008/-/K04/095AK	6NYCRR 229.3 (e) (2) (iv)	104	Volatile organic liquid storage tanks
U-00008/-/K04/091AE	6NYCRR 229.3 (e) (2) (v)	103	Volatile organic liquid storage tanks
U-00012/-/P15	6NYCRR 229.3 (e) (2) (v)	222	Volatile organic liquid storage tanks
U-00021	6NYCRR 229.3 (e) (2) (v)	244	Volatile organic liquid storage tanks
U-00053/-/I47	6NYCRR 229.3 (e) (2) (v)	431	Volatile organic liquid storage tanks
U-00056/-/I48	6NYCRR 229.3 (e) (2) (v)	459	Volatile organic liquid storage tanks
U-00060/-/I49	6NYCRR 229.3 (e) (2) (v)	505	Volatile organic liquid storage tanks
U-00086/-/J56	6NYCRR 229.3 (e) (2) (v)	578	Volatile organic liquid storage tanks
U-00087/-/N40/349DA	6NYCRR 229.3 (e) (2) (v)	586	Volatile organic liquid storage tanks
U-00087/-/N43	6NYCRR 229.3 (e) (2) (v)	588	Volatile organic liquid storage tanks
U-00008/-/K04	6NYCRR 229.5 (d)	102	Recordkeeping - VOL storage tanks



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

U-00012/-/P15	6NYCRR 229.5 (d)	223	Recordkeeping - VOL storage tanks
U-00053/-/I47	6NYCRR 229.5 (d)	432	Recordkeeping - VOL storage tanks
U-00056/-/I48	6NYCRR 229.5 (d)	460	Recordkeeping - VOL storage tanks
U-00060/-/I49	6NYCRR 229.5 (d)	506	Recordkeeping - VOL storage tanks
U-00086/-/J56	6NYCRR 229.5 (d)	579	Recordkeeping - VOL storage tanks
U-00087/-/N40/349DA	6NYCRR 229.5 (d)	587	Recordkeeping - VOL storage tanks
U-00087/-/N43	6NYCRR 229.5 (d)	589	Recordkeeping - VOL storage tanks
FACILITY	6NYCRR 231-11.2 (b)	40	Reasonable Possibility requirements for insignificant mods - less than 50% with excluded emissions
FACILITY	6NYCRR 231-11.2 (c)	41	Reasonable Possibility requirements for insignificant mods - greater than 50% with excluded emissions
FACILITY	6NYCRR 231-2.12	37, 38, 39	Table 2- Ozone nonattainment area and transport region classification for volatile organic compounds and nitrogen oxides
U-00024/317X5	6NYCRR 231-2.2 (d) (3)	333	Exemptions
U-00024/317X7	6NYCRR 231-2.2 (d) (3)	334	Exemptions
U-00045/08212	6NYCRR 231-2.2 (d) (3)	364	Exemptions
U-00047/03818	6NYCRR 231-2.2 (d) (3)	373	Exemptions
U-00053/-/I35/325AT	6NYCRR 231-2.2 (d) (3)	430	Exemptions
U-00056/304A8	6NYCRR 231-2.2 (d) (3)	462	Exemptions
U-00060/303A8/I26	6NYCRR 231-2.2 (d) (3)	508	Exemptions
U-00060/303X2/I26	6NYCRR 231-2.2 (d) (3)	513	Exemptions
U-00060/30403/I27	6NYCRR 231-2.2 (d) (3)	514	Exemptions
U-00060/304B0/I45	6NYCRR 231-2.2 (d) (3)	518, 519	Exemptions
U-00084	6NYCRR 231-2.2 (d) (3)	536	Exemptions
U-00085	6NYCRR 231-2.2 (d) (3)	545	Exemptions
U-00086	6NYCRR 231-2.2 (d) (3)	555	Exemptions
U-00025	6NYCRR 233.3	336	Control requirements.
U-00048	6NYCRR 233.3	377	Control requirements.
U-00053	6NYCRR 233.3	403	Control requirements.
U-00056	6NYCRR 233.3	442	Control requirements.
U-00060	6NYCRR 233.3	466	Control requirements.
U-00025	6NYCRR 233.3 (g)	337	Leak requirements
U-00048	6NYCRR 233.3 (g)	378	Leak requirements
U-00053	6NYCRR 233.3 (g)	404	Leak requirements
U-00056	6NYCRR 233.3 (g)	443	Leak requirements
U-00060	6NYCRR 233.3 (g)	467	Leak requirements
U-00053	6NYCRR 233.3 (h) (1)	405	Variances
U-00060	6NYCRR 233.3 (h) (1)	468	Variances
U-00009/-/H12	6NYCRR 236.2 (c)	198	Applicability.

**Applicability Discussion:**

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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

6 NYCRR 201-6.5 (a) (4)

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

6 NYCRR 201-6.5 (a) (7)

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

6 NYCRR 201-6.5 (a) (8)

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

6 NYCRR 201-6.5 (c)

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

6 NYCRR 201-6.5 (c) (2)

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

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

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

6 NYCRR 201-6.5 (d) (5)

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

6 NYCRR 201-6.5 (e)

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

6 NYCRR 201-6.5 (f) (6)

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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

6 NYCRR 201-6.5 (g)

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

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 215.2

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

40 CFR Part 68

This Part lists the regulated substances and 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 OPERATIONS AT EASTMAN BUSINESS PARK has been determined to be subject to the following regulations:

40 CFR 60.48c (g)

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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

40 CFR 60.48c (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.

40 CFR 61.342 (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.

40 CFR 61.356 (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

40 CFR 61.356 (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.

40 CFR 61.357 (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.

40 CFR 61.357 (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.

40 CFR 61.52 (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.

40 CFR 61.54 (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.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

40 CFR 61.55 (a)

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

40 CFR 63.1200 (c)

Conditions under §63.1200(c) incorporate by reference the General Provisions of 40 CFR 63 Subpart A that apply to Subpart EEE affected sources.

40 CFR 63.1206 (c)

This citation of the Hazardous Waste Combustor MACT rule (Subpart EEE) provides a summary of operating requirements, including: (1) General, (2) Startup, shutdown, and malfunction plan, (3) Automatic waste feed cutoff, (4) Emergency Safety Vent openings, (5) Combustion System Leaks, (6) Operator training and certification, and (7) the Operation and Maintenance plan.

40 CFR 63.1206 (c) (2)

This condition reduces the emissions of hazardous air pollutants (HAPs) by requiring the facility to come up with a way to reduce emissions when they are starting up or shutting down the combustor and related equipment, or when the equipment malfunctions. This condition requires the facility to develop a plan for dealing with these situations and minimizing the amount of toxic chemicals that get released to the atmosphere at these times.

40 CFR 63.1206 (c) (3)

This condition reduces the emissions of hazardous air pollutants (HAPs) by requiring the facility to implement an automatic shut-off system that will shut down the equipment that feeds hazardous waste into the incinerator. This will be done whenever any monitored value exceeds the emission standard set in this air permit.

40 CFR 63.1206 (c) (4)

This condition reduces the emissions of hazardous air pollutants (HAPs) by requiring the facility to implement ways to reduce HAP emissions when emergency safety vents (ESVs) are opened. The facility must develop and implement a plan to deal with ESV openings and try to correct the cause of the opening as fast as possible.

40 CFR 63.1206 (c) (5)

This condition requires the facility to reduce leaks of hazardous air pollutants (HAPs) by taking steps to reduce the leaking of HAPs in the combustion chamber.

40 CFR 63.1206 (c) (6)

This condition requires the facility to train their employees in order that they can operate the hazardous waste combustion system so that releases of hazardous air pollutants are minimized. This condition requires certain personnel to be certified and can operate the combustion system in an efficient manner



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

to reduce HAP emissions.

40 CFR 63.1206 (c) (7)

These conditions requires the facility to reduce hazardous air pollutant (HAP) emissions by creating and following an operation and maintenance plan (O&M plan) to run the hazardous waste combustion system in an efficient manner.

These conditions also require the facility to operate the baghouse (if it is equipped with one) with a leak detection system. This system must be monitored to make sure that hazardous air pollutant emissions do not escape through tears or other malfunctions in the fabric filters.

40 CFR 63.1207

This citation specifies the performance testing requirements as follows:

- (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.

40 CFR 63.1207 (j) (1)

This condition requires the facility to report to the NYSDEC whether the comprehensive performance test they performed showed that the facility met the emission standards in the hazardous waste combustor NESHAP rule. The report shall also have the operating parameter limits listed which will prove that the facility will continuously be in compliance until the next confirmatory performance test.

40 CFR 63.1207 (j) (2)

This condition requires the facility to report the results of the confirmatory performance test which will prove whether the hazardous waste combustor at the facility still meets the emission standards in the hazardous waste combustor NESHAP rule.

40 CFR 63.1207 (l)



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

This condition details steps that the facility must undertake if a performance test shows that the hazardous waste combustor does not meet the emission standards contained in the hazardous waste combustor NESHAP.

40 CFR 63.1209 (a) (2)

This condition requires the facility to ensure that the continuous monitor that is installed to be properly maintained and operated so that the emission results it reads is accurate.

40 CFR 63.1209 (a) (6)

This condition specifies how the facility will calculate the averages from the readings on its continuous emission monitors. This calculation will be compared to the emission limits to determine whether the facility is in compliance with the hazardous waste combustor NESHAP.

40 CFR 63.1209 (b)

(b) Other continuous monitoring systems (CMS).

(1) You must use CMS (e.g., thermocouples, pressure transducers, flow meters) to document compliance with the applicable operating parameter limits under this section.

(2) Except as specified in paragraphs (b)(2)(i) and (ii) of this section, you must install and operate continuous monitoring systems other than CEMS in conformance with § 63.8(c)(3) that requires you, at a minimum, to comply with the manufacturer's written specifications or recommendations for

installation, operation, and calibration of the system:

(i) Calibration of thermocouples. The calibration of a thermocouple or other temperature sensor must be verified at least once every three months; and

(ii) Accuracy and calibration of weight measurement devices. The accuracy of weight measurement devices used to monitor flowrate of a feedstream (e.g., activated carbon feedrate, sorbent feedrate, nonpumpable waste) must be  $\pm 1$  percent of the weight being measured. The calibration of the device must be verified at least once every three months.

(3) CMS must sample the regulated parameter without interruption, and evaluate the detector response at least once each 15 seconds, and compute and record the average values at least every 60 seconds.

(4) The span of the non-CEMS CMS detector must not be exceeded. You must interlock the span limits into the automatic waste feed cutoff system required by § 63.1206(c)(3).

(5) Calculation of rolling averages -- (i) Calculation of rolling averages initially. Continuous monitoring systems must begin recording one-minute average values by 12:01 a.m., hourly rolling average values by 1:01 a.m.(e.g., when 60 one-minute values will be available for calculating the initial hourly rolling average), and twelve-hour rolling averages by 12:01 p.m.(e.g., when 720 one-minute averages are available to calculate a 12-hour rolling average), for those sources that come into compliance on the regulatory compliance date. Sources that elect to come into compliance before the regulatory compliance date must begin recording one-minute, hourly rolling average, and 12-hour rolling average values within 60 seconds, 60 minutes (when 60 one-minute values will be available for calculating the initial hourly rolling average), and 720 minutes (when 720 one-minute values will be available for calculating the initial 12-hour hourly rolling average) respectively, from the time at which compliance begins.

(ii) Calculation of rolling averages upon intermittent operations. You must ignore periods of time when one-minute values are not available for calculating rolling averages. When one-minute values become available again, the first one-minute value is added to the previous one-minute values to calculate rolling averages.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

(iii) Calculation of rolling averages when the hazardous waste feed is cutoff. (A) Except as provided by paragraph (b)(5)(iii)(B) of this section, you must continue to monitoring operating parameter limits with a CMS when the hazardous waste feed is cutoff if the source is operating. You must not resume feeding hazardous waste if an operating parameter exceeds its limit. (B) You are not subject to the CMS requirements of this subpart during periods of time you meet the requirements of § 63.1206(b)(1)(ii) (compliance with emissions standards for nonhazardous waste burning sources when you are not burning hazardous waste).

40 CFR 63.1209 (b) (5)

This condition details how the facility shall calculate the hourly rolling averages to determine whether the parameter limits are being met continuously.

40 CFR 63.1209 (c) (2)

This condition requires the facility to develop a feedstream analysis plan in order to determine whether the properties of the feedstream meet the operating limits in this subpart. This analysis should include information on what the facility will measure, and how the parameter will be measured. The plan will be recorded in the facility's operating record.

40 CFR 63.1209 (g) (2)

Under this provision of the rule, the Department has specified additional facility-specific monitoring requirements for the MHI control system.

40 CFR 63.1209 (k) (2)

This condition requires that in order for the facility to determine if it is complying with the dioxin and furan emission standard, then a maximum flue gas flowrate or production rate must be established during the performance test.

40 CFR 63.1209 (k) (4)

This condition requires that in order for the facility to determine if it is complying with the dioxin and furan emission standard, then parameters must be established during the performance test which indicate proper operation of the waste firing system.

40 CFR 63.1209 (l) (1)

During the comprehensive performance test, the maximum level of mercury is established which will ensure that the hazardous waste combustor does not exceed the emission limit for mercury. The facility will then need to monitor the mercury content of the hazardous waste to prove that the limit has not been exceeded.

40 CFR 63.1209 (l) (2)

This condition requires the facility to establish operating limits for a wet scrubber in order to control the emissions of mercury to a level that complies with the mercury emission limit.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

40 CFR 63.1209 (m) (1) (i) ('A')

This condition requires the facility to monitor certain parameters to make sure their high energy wet scrubber (i.e. venturi) is working properly to control hazardous air pollutant emissions. This condition specifically requires the facility to monitor the pressure drop across the scrubber.

40 CFR 63.1209 (m) (1) (i) ('B') ('1')

This regulation requires that the liquid level in the Entrainment Separator Sump (Control Device 09510) (Venturi/Separator Recycle Tank) be maintained at or above 33 inches on a rolling hourly basis. The liquid level shall be monitored on a continuous basis when wastewater, grit or debris is being incinerated

40 CFR 63.1209 (m) (1) (i) ('C')

This condition requires the facility to monitor certain parameters to make sure their high energy wet scrubber is working properly to control hazardous air pollutant emissions.

40 CFR 63.1209 (m) (3)

This regulation requires that the ash feed rate to the Multiple Hearth Incinerator (MHI) be limited to 18,720 lbs/12 hours on a rolling 12-hourly basis. The ash feed rate shall be monitored on a continuous basis using data collected for the feed analysis plan and the continuous sludge feedrate measurement when wastewater, grit or debris is being incinerated.

40 CFR 63.1209 (n) (2)

This regulation requires that the Multiple Hearth Incinerator (MHI) not exceed 14,441 grams/12 hour on a rolling 12-hourly basis. The low-volatile metal feed rate shall be monitored on a continuous basis using data collected for the feed analysis plan and the continuous sludge feed rate measurement when wastewater, grit or debris is being incinerated

40 CFR 63.1209 (o) (1)

In order for the hazardous waste combustor to meet the emission limits for hydrochloric acid and chlorine gas, then during the comprehensive performance test the facility must establish operating limits that prove that the facility will be in compliance with the metal limits as long as the operating parameter is being met. This condition specifically requires the facility to set a limit for the maximum amount of chlorine and chloride in the hazardous waste feedstream.

40 CFR 63.1209 (o) (3) (ii)

If the facility equips the hazardous waste combustor with a low energy wet scrubber, then this condition requires the facility to monitor certain parameters to make sure the scrubber is working properly to control hydrochloric acid and chloride gas emissions. This condition specifically requires the facility to monitor the pressure drop across the scrubber.

40 CFR 63.1209 (o) (3) (iv)



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

If the facility equips the hazardous waste combustor with a wet scrubber, then this condition requires the facility to monitor certain parameters to make sure the scrubber is working properly to control hydrochloric acid and chloride gas emissions. This condition specifically requires the facility to monitor the pH in the scrubber.

40 CFR 63.1209 (o) (3) (v)

If the facility equips the hazardous waste combustor with a low energy wet scrubber, then this condition requires the facility to monitor certain parameters to make sure the scrubber is working properly to control hydrochloric acid and chloride gas emissions. This condition specifically requires the facility to monitor the minimum liquid-gas ratio or minimum scrubber water flowrate and maximum flue gas flowrate in the scrubber.

40 CFR 63.1211 (a)

This citation specifies the requirements to submit a semiannual Summary Report and Startup, Shutdown & Malfunction Report (SSMP) under Subpart EEE.

40 CFR 63.1211 (b)

This condition lists the information that the facility must keep on record at the plant. This information will assist the NYSDEC when the facility is inspected in order to determine whether the plant has been in compliance with the emission standards listed in this subpart EEE. Information that must be recorded includes instrument readings which indicate whether any control devices were working, whether there were any startups, shutdowns, or malfunctions at the facility, and whether the plant has changed its operation in a way that could affect the emissions from the incinerator.

40 CFR 63.1219 (a)

This condition states the emission standards for existing incinerators which replace the interim standards under 63.1203.

40 CFR 63.2342 (b)

This citation of the Organic Liquid Distribution MACT rule (Subpart EEEE) states that if an addition or change other than reconstruction is made that causes the total actual annual facility-level organic liquid loading volume to exceed 800,000 gallons, Kodak must comply with the transfer rack requirements specified in §63.2346(b) immediately; that is, be in compliance the first day of the period following the end of the 3-year period triggering the control criteria.

40 CFR 63.2343

This regulation requires if an addition or change other than reconstruction is made that causes the total actual annual facility-level organic liquid loading volume to exceed 800,000 gallons, Kodak must comply with the transfer rack requirements specified in §63.2346(b) immediately; that is, be in compliance the first day of the period following the end of the 3-year period triggering the control criteria.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

40 CFR 63.2346 (a)

This regulation sets the emission limits, operating limits and emission standards for storage tanks that are subject to 40 CFR 63 Subpart EEEE.

40 CFR 63.2346 (c)

This regulation requires that for each U-00021 pump, valve, and sampling connection subject to 40 CFR Part 63 Subpart EEEE that operates in organic liquids service for at least 300 hours per year, Kodak must comply with the applicable requirements under 40 CFR Part 63, Subpart TT (control level 1), Subpart UU (control level 2), or Subpart H. Pumps, valves, and sampling connectors that are insulated to provide protection against persistent sub-freezing temperatures are subject to the "difficult to monitor" provisions in the applicable Subpart selected by the owner or operator.

40 CFR 63.2350

This condition states the General Requirements of the Organic Liquid Distribution (OLD) MACT rule (Subpart EEEE): emission limitations, operating limits, work practice standards and a written startup, shutdown, and malfunction (SSM) plan .

40 CFR 63.2378

This citation state the requirements for demonstrating continuous compliance with emission limits, operating limits, and work practice standards in Subpart EEEE Tables 2 through 4.

40 CFR 63.2386

This condition identifies the reporting requirements for organic liquid distribution operations subject to Subpart EEEE.

40 CFR 63.2390

This condition identifies the records that must be maintained organic liquid distribution operations subject to Subpart EEEE.

40 CFR 63.2394

This condition identifies the format and length of time records must be maintained for organic liquid distribution operations subject to Subpart EEEE.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

40 CFR 63.2398

This condition references the General Provisions applicable to organic liquid distribution operations subject to Subpart EEEE.

40 CFR 63.2435 (d)

This citation describes how to determine the applicability of a transfer rack loading arm or storage tank(s) under the Miscellaneous Organic Chemical Manufacturing MACT rule (Subpart FFFF).

40 CFR 63.2450 (e)

This citation references General Requirements for Closed Vent Systems subject to the Miscellaneous Organic Chemical Manufacturing rule (Subpart FFFF).

40 CFR 63.2450 (k) (3)

This citation references General Requirements for Continuous Parameter Monitoring Systems subject to the Miscellaneous Organic Chemical Manufacturing rule (Subpart FFFF) and provides for the alternative of measuring caustic strength of scrubber effluent rather than pH.

40 CFR 63.2455 (b)

2435(d)

This citation describes how to determine the applicability of a transfer rack loading arm or storage tank(s) under the Miscellaneous Organic Chemical Manufacturing (MON) rule (Subpart FFFF).

2450(e)

This citation describes the requirements for determining applicability under the MON rule for Continuous Process Vents.

40 CFR 63.2460 (b)

This citation describes the requirements for determining applicability (“Group status”) under the MON rule for Batch Process Vents.

40 CFR 63.2465 (a)

This citation describes the MON requirements for Process Vents that emit hydrogen halide and halogen



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

HAP or PM HAP.

40 CFR 63.2465 (b)

This citation describes the MON requirements for Process Vents that emit hydrogen halide and halogen HAP or PM HAP.

40 CFR 63.2465 (c) (1)

This citation references MON requirements for Process Vents with collective uncontrolled hydrogen halide and halogen HAP emissions greater than or equal to 1000 lbs/yr and, in cases where a stack test is required, provides the alternative of conducting a design evaluation.

40 CFR 63.2470 (a)

This citation references the requirements for Storage Tanks under the MON rule.

40 CFR 63.2470 (d)

This citation states the requirements for planned routine maintenance of Storage Tanks under the MON rule.

40 CFR 63.2475

This citation states the requirements for Transfer Racks under the MON rule.

40 CFR 63.2480

This citation states the requirements for equipment leaks under the MON rule.

40 CFR 63.2485

This citation states the requirements for wastewater streams and liquid streams in open systems within an applicable process unit under the MON rule.

40 CFR 63.2485 (j)

This citation states the requirement to determine the concentration and flow rate for wastewater streams within each applicable process unit under the MON rule.

40 CFR 63.2490

This regulation sets forth the requirements for heat exchangers used in miscellaneous organic chemical manufacture.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

40 CFR 63.2520

This citation includes the reporting requirements, specifically the Semiannual Compliance report, under the Miscellaneous Organic Chemical Manufacturing rule (Subpart FFFF).

40 CFR 63.2525

Under this citation, compliance options are described when the facility's equipment is subject to both Subpart FFFF and another Subpart.

40 CFR 63.2535 (h)

This citation describes the options of compliance under Subpart FFFF instead of compliance with 40 CFR 60 Subpart DDD, III, NNN, or RRR.

40 CFR 63.2535 (k)

Under this citation, compliance options are described when the facility's equipment is subject to both Subpart FFFF and 40 CFR 60 Subpart VV or 40 CFR 61Subpart V.

40 CFR 63.2535 (l)

This citation explains the option of creating a Process Unit Group (PUG) under Subpart FFFF which may then be used to demonstrate compliance with other Part 63 rules.

40 CFR 63.2540

This citation references the General Provisions that apply to a MON applicable facility.

40 CFR 63.3340

This citation specifies which general provisions of Subpart A apply to sources applicable to the Paper and Other Web Coating MACT (Subpart JJJJ).

40 CFR 63.3370 (c)

This citation specifies the compliance requirements for affected Subpart JJJJ sources to meet the organic HAP limits specified in the rule.

40 CFR 63.3400 (c) (2)

This condition spells out the information that needs to be submitted in the semi-annual compliance reports that must be submitted in order to show that the facility has been meeting the emission limits contained in this subpart.

40 CFR 63.3410 (a)



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

This condition spells out which records the facility must keep in order to prove that the facility is meeting the requirements in this subpart. The records need to be kept on a monthly basis and include items such as CEM data, material usage, HAP content, and operating parameter data.

40 CFR 63.460 (b)

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

40 CFR 63.462 (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.

40 CFR 63.462 (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.

40 CFR 63.471 (b) (1)

States that a log must be maintained of addition and deletions of solvent from solvent cleaning machines.

40 CFR 63.471 (b) (2)

Sets total emission limits for facility wide emissions of perchloroethylene, trichloroethylene and methylene chloride.

40 CFR 63.471 (c)

Specifies procedures to demonstrate compliance with facility wide solvent emission rate.

40 CFR 63.471 (h)

Sets requirements for solvent emission report.

40 CFR 63.6602

These conditions list the emission limits, operating limits, and work practices that existing engines with a site rating less than or equal to 500 brake horsepower located at a major source of HAP emissions must meet.

The engines must meet work practices or emission limits on carbon monoxide or formaldehyde for the specific type of engine listed in table 2c of subpart ZZZZ.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

40 CFR 63.6625 (e)

This regulation requires the owners or operator of an existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions, an existing stationary emergency RICE, or an existing stationary RICE located at an area source of HAP emissions must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

40 CFR 63.6625 (f)

This regulation requires the owners or operator of an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary emergency RICE located at an area source of HAP emissions, to install a non-resettable hour meter if one is not already installed.

40 CFR 63.6625 (h)

This regulation requires the owner or operator of a reciprocating internal combustion engine, operating at a major source of hazardous air pollutants, to minimize the idling time of the engine at startup. Startup time is limited to 30 minutes or less.

40 CFR 63.6640 (f) (1)

This regulation sets forth the compliance provisions for the operation of reciprocating internal combustion engines in emergency situations.

40 CFR 63.6640 (f) (2)

This regulation sets forth the compliance provisions for the operation of reciprocating internal combustion engines installed prior to June 12, 2006 with a site rating greater than 500 brake horsepower located at a major source of HAP emissions in emergency situations.

40 CFR 63.6655 (f)

This regulation requires the owner/operator of a reciprocating internal combustion engine to record the number of hours the engine has been used, in both emergency and non-emergency use.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

40 CFR 63.6665

This regulation specifies which provisions of the General provisions (Subpart A of 40 CFR 63) apply to the owner or operators of stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40 CFR 63.680 (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.

40 CFR 63.683 (b) (2) (ii)

This regulatory citation provides for an exemption of the Subpart DD offsite-waste requirements, provided that the total annual quantity of HAP contained in the off-site material placed in the units exempted under this paragraph (b)(2)(ii) is less than 1 megagram per year. The owner or operator must identify the exempt units and maintain documentation of off-site HAP wastestreams in accordance with paragraphs (b)(2)(ii)(A) and (b)(2)(ii)(B) of this section.

40 CFR 63.7184 (b)

40 CFR 63.7184 (c)

40 CFR 63.7184 (f)

This regulation limits the emissions of hazardous air pollutants, from combined process vents, to less than 14.22 parts per million (volume). These limitations can be met by venting emissions from the process vent through a closed vent system to any combination of control devices meeting the requirements of §63.982(a)(2).

40 CFR 63.7190 (a) (1)

40 CFR 63.7190 (a) (2)



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

40 CFR 63.7191 (a) (1)

40 CFR 63.7191 (a) (2)

40 CFR 63.7193

40 CFR 63.8000 (a)

This citation specifies where to find the emission limits and work practice standards for the Miscellaneous Organic Coatings NESHAP (Subpart HHHHH).

40 CFR 63.8000 (b)

This citation clarifies the allowable conditions and record keeping associated with opening a safety device to avoid unsafe conditions.

40 CFR 63.8015

This citation states the requirements for addressing leaks on equipment subject to certain exclusions.

40 CFR 63.8030

This citation specifies the which requirements apply to heat exchange systems.

40 CFR 63.8075 (e)

This citation states the required content of the semiannual compliance reports required under Subpart HHHHH.

40 CFR 63.8095

This citation states where the applicable general provisions can be found in Subpart A.

40 CFR 63.823

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



**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

Table 1 of Subpart KK - National Emission Standards for the Printing and Publishing Industry, provides cross references to the General Provisions of 40 CFR 63Subpart A.

40 CFR 63.825 (d) (1)

This citation specifies the calculation of the oxidizer destruction efficiency, capture system efficiency and overall organic HAP control efficiency, based on the performance test data.

40 CFR 63.825 (f) (3) (i)

This citation requires monitoring an operating parameter established in accordance with §63.828(a)(4) to assure control device efficiency.

40 CFR 63.825 (f) (3) (ii)

This citation requires monitoring an operating parameter established in accordance with §63.828(a)(5) to assure capture efficiency.

40 CFR 63.825 (g)

This paragraph specifies the calculation method for the organic HAP emitted during the month from a press or group of presses having one or more never-controlled or intermittently controlled work stations.

40 CFR 63.828 (a)

This paragraph specifies the monitoring and inspection requirements for each control device required to comply with the standard.

40 CFR 63.828 (a) (2) (ii)

This citation specifies the requirements for temperature monitoring equipment used to demonstrate compliance.

40 CFR 63.828 (a) (4) (i)

This regulation sets forth the monitoring requirements for facilities that use an oxidizer, other than a catalytic oxidizer to control VOCs from a printing operation. The owner or operator must monitor the temperature in the combustion zone of the oxidizer.

40 CFR 63.829 (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 the flexographic and rotogravure stations account for less than 5% of the total coatings, inks, etc. applied



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

on the whole machine. The exemption mostly applies to surface coating and laminating machines that perform "incidental" printing.

40 CFR 63.830 (b) (5)

This paragraph states the requirements for Start-up, shutdown, and malfunction reports specified in §63.10(d)(5) of this part, except that the provisions in subpart A pertaining to start-ups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.

40 CFR 63.830 (b) (6)

This paragraph states the requirements for a semiannual compliance summary report.

40 CFR 64.7

This section states the general requirements of operating and maintaining the monitoring system approved under the facility's CAM Plan.

40 CFR 64.8

This section lists the elements of a Quality Improvement Plan (QIP). A QIP may be required if a permittee has a number of exceedances or excursions of its Compliance Assurance Monitoring (CAM) program during a reporting period.

40 CFR 64.9

This section specifies the general requirements for recording and reporting excursions or exceedances of CAM conditions and actions taken to implement a Quality Improvement Program (QIP), if applicable.

40 CFR Part 60, Subpart 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

40 CFR Part 61, Subpart 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.

40 CFR Part 61, Subpart M

This is the National Emission Standard for Asbestos and it includes provisions for handling and



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

disposing of asbestos.

40 CFR Part 63, Subpart FFFF

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous organic chemical manufacturing and is known as the MON MACT rule. The rule includes emission limits, operating limits and work practice standards for applicable equipment identified under the rule as miscellaneous organic process units (MCPU).

40 CFR Part 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6 NYCRR 200.3

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

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

6 NYCRR 212.10 (c) (3)

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

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

VOC removal efficiency greater than 81% is considered RACT.

6 NYCRR 212.10 (c) (4) (iii)

This section allows source owners who 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.

6 NYCRR 212.10 (f)

Owners and/or operators of NOx and VOC sources must submit a RACT compliance plan with each application for a permit to construct and implement this plan when operation commences. A RACT analysis is not required for sources with potential emissions less than 3 lb/hr and actual emissions less than 15 lb/day at facilities outside of the lower Orange County and New York City metropolitan areas.

6 NYCRR 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.

6 NYCRR 212.4 (b)

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

6 NYCRR 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 an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6 NYCRR 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.

6 NYCRR 212.5 (e)

If a process emission source meets certain other requirements the source is considered as having met the



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

requirements of this Part. More details are provided in the regulation.

6 NYCRR 212.6 (a)

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

6 NYCRR 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.

6 NYCRR 227-2.4

This section specifies control requirements for boilers, turbines, and reciprocating engines.

6 NYCRR 227-2.4 (d)

This section includes NO<sub>x</sub> RACT requirements for small boilers, small combustion turbines, and small stationary internal combustion engines.

6 NYCRR 228-1.1 (d)

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

6 NYCRR 228-1.1 (e) (13)

This citation allows an exemption from Part 228 VOC control requirements for low use surface coatings used for intermittent or specialty coatings where the 12-month facility-wide total of coatings under this exemption does not exceed 55 gallons.

6 NYCRR 228-1.10

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

6 NYCRR 228-1.3 (c)

This citation specifies removal efficiency for an air cleaning device used as a control strategy. The air



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

cleaning device must achieve an overall removal efficiency of the lower of 85% removal or the removal determined using the equation specified in 6 NYCRR part 228.3(c).

6 NYCRR 228-1.3 (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.

6 NYCRR 228-1.3 (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.

6 NYCRR 228-1.4

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.

6 NYCRR 228-1.5 (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.

6 NYCRR 228-1.5 (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.

6 NYCRR 228-1.5 (c)

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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

6 NYCRR 228-1.5 (d)

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

6 NYCRR 228-1.5 (g) (3)

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

6 NYCRR 228-1.5 (j)

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

6 NYCRR 228-1.6 (a)

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

6 NYCRR 228-1.6 (b)

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.

6 NYCRR 228-1.7

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.

6 NYCRR 228-2.3 (e)

This regulation requires that if an operator uses a commercial or industrial adhesive or sealant subject to a specific VOC content limit for such adhesive or sealant in table 1 of section 228-2.3, such specific limit is applicable rather than an adhesive-to-substrate limit; and if an adhesive is used to bond dissimilar substrates together, the applicable substrate category with the highest VOC content shall be the limit for such use.

6 NYCRR 228-2.3 (f) (1)

This citation specifies the limits for surface preparation and cleanup solvents regulated under Subpart 228-2.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

6 NYCRR 228-2.3 (f) (3)

This citation specifies the requirements to minimize VOCs by limiting the vapor pressure of cleanup solvents used.

6 NYCRR 228-2.3 (f) (4)

This citation specifies the work practice requirements for clean up of the spray application equipment.

6 NYCRR 228-2.3 (h)

This citation specifies the VOC control approaches for adhesive application processes at facilities where the total 12-month VOC emissions exceeds 3 tons.

6 NYCRR 228-2.3 (i)

This citation states the general prohibition of use (or specification for use) of adhesives, sealants, adhesive primers, sealant primer, surface preparation or clean-up solvents which violate 228-2.

6 NYCRR 228-2.4

This citation describes the exemptions to these requirements.

6 NYCRR 228-2.5 (a)

This regulation sets forth the recordkeeping requirements to show compliance with the VOC limits in 6 NYCRR 228-2.3.

6 NYCRR 228-2.5 (d)

This citation specifies the record keeping requirements for adhesives, sealants, adhesive primers and sealant primers subject to the laboratory testing exemption under 228-2.4(a)(1) of the Subpart.

6 NYCRR 228-2.7 (b)

This citation states the acceptable methods for calculating the VOC content of an adhesive, sealant, adhesive primer or sealant primer.

6 NYCRR 229.3 (e) (2) (iv)

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

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

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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

6 NYCRR 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.

6 NYCRR 231-11.2 (b)

This citation lists the record keeping requirements for insignificant modifications that are less than 50% of the applicable significant project threshold including excluded emissions as defined in Part 231-4.1(b)(40)(i)(c).

6 NYCRR 231-11.2 (c)

This subdivision lists the reasonable possibility requirements for insignificant modifications that are greater than 50% of the threshold including excluded emissions as defined in 231-4.1(b)(40)(i)(c) of this Part.

6 NYCRR 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.

6 NYCRR 231-2.2 (d) (3)

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.

The purpose of Section 231-2.2 is to define what new or modified facilities are subject to the requirements set forth in the other sections of the rule. The specific applicability exemptions to Subpart 231-2 are set forth in subsection (d).

6 NYCRR 233.3

This citation specifies the control requirements for equipment subject to the Pharmaceutical and Cosmetic Manufacturing RACT rule.

6 NYCRR 233.3 (g)

This citation specifies leak repair provisions for equipment subject to the Pharmaceutical and Cosmetic Manufacturing RACT rule.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

6 NYCRR 233.3 (h) (1)

This condition allows the facility to operate with a lesser degree on control than is otherwise required in the pharmaceutical and cosmetic manufacturing processes rule (Part 233) where it can be shown that it is impractical or not economically feasible to control the process to the levels indicated in the rule.

6 NYCRR 236.2 (c)

This regulation allows facilities to substitute compliance with stricter leak detection and repair (LDAR) plans required by Federal regulations for the LDAR requirements of Part 236.

6 NYCRR Part 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.

6 NYCRR Part 226

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

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>
U-00009	40 CFR Part 63, Subpart DD	NESHAP for Off-Site Waste and Recovery Operations

Reason: The Distilling West operations (EU U-00009) are not subject to 40 CFR 63 Subpart DD since 63.680(a)(2) is not applicable. Acceptance of off-site materials for recovery at Distilling West is neither a "waste management operation" per 63.681, nor do any of the specified "recovery operation" restrictions in 63.680(a)(2)(iv-vi) describe this process.

U-00021/-/H81	40 CFR Part 63, Subpart DD	NESHAP for Off-Site Waste and Recovery Operations
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Reason: Distilling East equipment used to process materials generated



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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00008/-/K02	98	intermittent emission testing
FACILITY	43	monitoring of process or control device parameters as surrogate
FACILITY	45	record keeping/maintenance procedures
FACILITY	46	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures
U-00020/-/N04	240	record keeping/maintenance procedures
U-00020/-/N05	241	record keeping/maintenance procedures
U-00020/-/N06	242	record keeping/maintenance procedures
U-00020	235	record keeping/maintenance procedures
U-00020	236	record keeping/maintenance procedures
U-00020	237	record keeping/maintenance procedures
U-00020	238	record keeping/maintenance procedures
U-00020	239	record keeping/maintenance procedures
U-00008	92	record keeping/maintenance procedures
U-00008	93	work practice involving specific operations
U-00008	94	record keeping/maintenance procedures
U-00008/09503	107	record keeping/maintenance procedures
U-00008/09503	108	record keeping/maintenance procedures
U-00008/09503	110	record keeping/maintenance procedures
U-00008/09503	111	record keeping/maintenance procedures
U-00008/09503	113	record keeping/maintenance procedures
U-00008/09503	114	record keeping/maintenance procedures
U-00008/09503	115	record keeping/maintenance procedures
U-00008/09503	116	monitoring of process or control device parameters as surrogate
U-00008/09503	119	record keeping/maintenance procedures
U-00008/09503	120	record keeping/maintenance procedures
U-00008/09503	121	record keeping/maintenance procedures
U-00008/09503	122	record keeping/maintenance procedures
U-00008/09503	123	record keeping/maintenance procedures
U-00008/09503	124	record keeping/maintenance procedures
U-00008/09503	125	record keeping/maintenance procedures
U-00008/09503	128	record keeping/maintenance procedures
U-00008/-/K02	100	record keeping/maintenance procedures
U-00008/09503	129	record keeping/maintenance procedures
U-00008/-/K02	101	record keeping/maintenance procedures
U-00008/09503	130	record keeping/maintenance procedures
U-00008/09503	131	monitoring of process or control device parameters as surrogate
U-00008/09503	132	monitoring of process or control device parameters as surrogate
U-00008/09503	133	monitoring of process or control device parameters as surrogate
U-00008/09503	134	monitoring of process or control device parameters as surrogate
U-00008/09503	135	monitoring of process or control device parameters as surrogate
U-00008/09503	136	monitoring of process or control device parameters as surrogate
U-00008/09503	137	monitoring of process or control device parameters as surrogate
U-00008/09503	138	monitoring of process or control device parameters as surrogate
U-00008/09503	139	monitoring of process or control device parameters as surrogate
U-00008/09503	140	monitoring of process or control device parameters as surrogate
U-00008/09503	141	monitoring of process or control device parameters as surrogate
U-00008/09503	142	monitoring of process or control device parameters as surrogate
U-00008/09503	145	monitoring of process or control device parameters as surrogate

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00008/09503	146	monitoring of process or control device parameters as surrogate
U-00008/09503	143	monitoring of process or control device parameters as surrogate
U-00008/09503	144	monitoring of process or control device parameters as surrogate
U-00008/09503	147	monitoring of process or control device parameters as surrogate
U-00008/09503	148	monitoring of process or control device parameters as surrogate
U-00008/09503	149	monitoring of process or control device parameters as surrogate
U-00008/09503	150	monitoring of process or control device parameters as surrogate
U-00008/09503	151	monitoring of process or control device parameters as surrogate
U-00008/09503	152	monitoring of process or control device parameters as surrogate
U-00008/09503	153	monitoring of process or control device parameters as surrogate
FACILITY	51	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
U-00008/09503	154	record keeping/maintenance procedures
U-00008/09503	155	continuous emission monitoring (cem)
U-00008/09503	156	monitoring of process or control device parameters as surrogate
U-00021	245	record keeping/maintenance procedures
U-00009	163	record keeping/maintenance procedures
U-00021	246	record keeping/maintenance procedures
U-00021/14201/H80	289	monitoring of process or control device parameters as surrogate
U-00021	247	record keeping/maintenance procedures
U-00021	248	record keeping/maintenance procedures
U-00021	249	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
U-00009	164	record keeping/maintenance procedures
U-00021	250	record keeping/maintenance procedures
U-00009	165	record keeping/maintenance procedures
U-00021	251	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
U-00009	166	record keeping/maintenance procedures
U-00009	167	record keeping/maintenance procedures
U-00009	168	record keeping/maintenance procedures
U-00021/14201/H81	290	monitoring of process or control device parameters as surrogate
U-00009	169	record keeping/maintenance procedures
U-00021/-/H81	252	record keeping/maintenance procedures
U-00009	170	record keeping/maintenance procedures
U-00009	171	record keeping/maintenance procedures
U-00009	172	record keeping/maintenance procedures
U-00009	173	record keeping/maintenance procedures
U-00009	174	record keeping/maintenance procedures
U-00009	175	record keeping/maintenance procedures
U-00021/-/H81	253	record keeping/maintenance procedures
U-00021/-/H81	254	record keeping/maintenance procedures
U-00021/-/H81	255	record keeping/maintenance procedures
U-00021/-/H81	256	record keeping/maintenance procedures
U-00021/-/H81	257	record keeping/maintenance procedures
U-00021/-/H81	258	record keeping/maintenance procedures
U-00053	406	record keeping/maintenance procedures
U-00053/325X3/I35/325AP	435	record keeping/maintenance procedures
U-00053/325X3/I35/325AP	436	record keeping/maintenance procedures
U-00053/325X3/I35/325AP	437	record keeping/maintenance procedures



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

U-00060	469	record keeping/maintenance procedures
U-00060	470	record keeping/maintenance procedures
U-00060	471	record keeping/maintenance procedures
U-00060	472	record keeping/maintenance procedures
U-00053/-/I35	422	record keeping/maintenance procedures
U-00060	473	record keeping/maintenance procedures
U-00021/-/H81	259	record keeping/maintenance procedures
U-00021/-/H81	260	record keeping/maintenance procedures
U-00025	338	record keeping/maintenance procedures
U-00048/-/I01	379	record keeping/maintenance procedures
U-00053/-/I35	423	record keeping/maintenance procedures
U-00060	474	record keeping/maintenance procedures
U-00060/304B0	515	monitoring of process or control device parameters as surrogate
U-00060/304B0	516	monitoring of process or control device parameters as surrogate
U-00060/304B0	517	monitoring of process or control device parameters as surrogate
U-00060/304X1	523	monitoring of process or control device parameters as surrogate
U-00060/304X1	524	monitoring of process or control device parameters as surrogate
U-00060/304X1	525	monitoring of process or control device parameters as surrogate
U-00025	339	record keeping/maintenance procedures
U-00048/-/I01	380	record keeping/maintenance procedures
U-00053/-/I35	424	record keeping/maintenance procedures
U-00060	475	record keeping/maintenance procedures
U-00053/325X3/I35/325AP	438	monitoring of process or control device parameters as surrogate
U-00053/325X3/I35/325AP	439	monitoring of process or control device parameters as surrogate
U-00053/325X3/I35/325AP	440	monitoring of process or control device parameters as surrogate
U-00060/303X1	510	monitoring of process or control device parameters as surrogate
U-00060/303X1	511	monitoring of process or control device parameters as surrogate
U-00060/303X1	512	monitoring of process or control device parameters as surrogate
U-00021/-/H81	261	record keeping/maintenance procedures
U-00009	176	record keeping/maintenance procedures
U-00021/-/H81	262	record keeping/maintenance procedures
U-00021/-/H81	263	record keeping/maintenance procedures
U-00009	177	record keeping/maintenance procedures
U-00009	178	record keeping/maintenance procedures
U-00009	179	record keeping/maintenance procedures
U-00009	180	record keeping/maintenance procedures
U-00009	181	record keeping/maintenance procedures
U-00009	182	record keeping/maintenance procedures
U-00009	183	record keeping/maintenance procedures
U-00009	184	record keeping/maintenance procedures
U-00009	185	record keeping/maintenance procedures
U-00009	186	record keeping/maintenance procedures
U-00021/-/H81	264	record keeping/maintenance procedures
U-00021/-/H81	265	record keeping/maintenance procedures
U-00021/-/H81	266	record keeping/maintenance procedures
U-00021/-/H81	267	record keeping/maintenance procedures
U-00021/-/H81	268	record keeping/maintenance procedures
U-00021/-/H81	269	record keeping/maintenance procedures
U-00021/-/H81	270	record keeping/maintenance procedures
U-00021/-/H81	271	record keeping/maintenance procedures
U-00021/-/H81	272	record keeping/maintenance procedures
U-00023/-/H07	294	record keeping/maintenance procedures



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

U-00023/-/H07	295	record keeping/maintenance procedures
U-00023/-/H07	296	record keeping/maintenance procedures
U-00023/-/H07	297	record keeping/maintenance procedures
U-00023/-/H07	298	record keeping/maintenance procedures
U-00025	340	record keeping/maintenance procedures
U-00025	341	record keeping/maintenance procedures
U-00025	342	record keeping/maintenance procedures
U-00025	343	record keeping/maintenance procedures
U-00025	344	record keeping/maintenance procedures
U-00025	345	record keeping/maintenance procedures
U-00025	346	record keeping/maintenance procedures
U-00025	347	record keeping/maintenance procedures
U-00025	348	record keeping/maintenance procedures
U-00048/-/I01	381	record keeping/maintenance procedures
U-00048/-/I01	382	record keeping/maintenance procedures
U-00048/-/I01	383	record keeping/maintenance procedures
U-00048/-/I01	384	record keeping/maintenance procedures
U-00048/-/I01	385	record keeping/maintenance procedures
U-00048/-/I01	386	record keeping/maintenance procedures
U-00048/-/I01	387	record keeping/maintenance procedures
U-00053	407	record keeping/maintenance procedures
U-00053	408	record keeping/maintenance procedures
U-00053	409	record keeping/maintenance procedures
U-00053	410	record keeping/maintenance procedures
U-00053	411	record keeping/maintenance procedures
U-00053	412	record keeping/maintenance procedures
U-00053	413	record keeping/maintenance procedures
U-00053	414	record keeping/maintenance procedures
U-00053	415	record keeping/maintenance procedures
U-00056	444	record keeping/maintenance procedures
U-00056	445	record keeping/maintenance procedures
U-00056	446	record keeping/maintenance procedures
U-00056	447	record keeping/maintenance procedures
U-00056	448	record keeping/maintenance procedures
U-00056	449	record keeping/maintenance procedures
U-00056/-/I33	455	record keeping/maintenance procedures
U-00060	476	record keeping/maintenance procedures
U-00060	477	record keeping/maintenance procedures
U-00060	478	record keeping/maintenance procedures
U-00060	479	record keeping/maintenance procedures
U-00060	480	record keeping/maintenance procedures
U-00060	481	record keeping/maintenance procedures
U-00060	482	record keeping/maintenance procedures
U-00060	483	record keeping/maintenance procedures
U-00060	484	record keeping/maintenance procedures
U-00009	187	record keeping/maintenance procedures
U-00009	188	record keeping/maintenance procedures
U-00009	189	record keeping/maintenance procedures
U-00009	190	record keeping/maintenance procedures
U-00021/-/H81	273	record keeping/maintenance procedures
U-00021/-/H81	274	record keeping/maintenance procedures
U-00021/-/H81	275	record keeping/maintenance procedures
U-00021/-/H81	276	record keeping/maintenance procedures
U-00023/-/H07	299	record keeping/maintenance procedures
U-00023/-/H07	300	record keeping/maintenance procedures
U-00025	349	record keeping/maintenance procedures
U-00025	350	record keeping/maintenance procedures
U-00025	351	record keeping/maintenance procedures
U-00025	352	record keeping/maintenance procedures
U-00048/-/I01	388	record keeping/maintenance procedures
U-00048/-/I01	389	record keeping/maintenance procedures
U-00048/-/I01	390	record keeping/maintenance procedures
U-00048/-/I01	391	record keeping/maintenance procedures
U-00048/-/I01	392	record keeping/maintenance procedures



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

U-00053	416	record keeping/maintenance procedures
U-00053	417	record keeping/maintenance procedures
U-00053	418	record keeping/maintenance procedures
U-00056	450	record keeping/maintenance procedures
U-00056/-/I33	456	record keeping/maintenance procedures
U-00060	485	record keeping/maintenance procedures
U-00060	486	record keeping/maintenance procedures
U-00060	487	record keeping/maintenance procedures
U-00060	488	record keeping/maintenance procedures
U-00060	489	record keeping/maintenance procedures
U-00009	191	record keeping/maintenance procedures
U-00021/-/H81	277	record keeping/maintenance procedures
U-00023/-/H07	301	record keeping/maintenance procedures
U-00025	353	record keeping/maintenance procedures
U-00048/-/I01	393	record keeping/maintenance procedures
U-00053	419	record keeping/maintenance procedures
U-00060	490	record keeping/maintenance procedures
U-00089	594	record keeping/maintenance procedures
U-00009	192	record keeping/maintenance procedures
U-00009	193	record keeping/maintenance procedures
U-00021/-/H81	278	record keeping/maintenance procedures
U-00021/-/H81	279	record keeping/maintenance procedures
U-00025	354	record keeping/maintenance procedures
U-00025	355	record keeping/maintenance procedures
U-00053/-/I35	425	record keeping/maintenance procedures
U-00053/-/I35	426	record keeping/maintenance procedures
U-00056	451	record keeping/maintenance procedures
U-00056	452	record keeping/maintenance procedures
U-00060	491	record keeping/maintenance procedures
U-00060	492	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
U-00009	194	record keeping/maintenance procedures
U-00009	195	record keeping/maintenance procedures
U-00009	196	record keeping/maintenance procedures
U-00009	197	record keeping/maintenance procedures
U-00021/-/H81	280	record keeping/maintenance procedures
U-00021/-/H81	281	record keeping/maintenance procedures
U-00021/-/H81	282	record keeping/maintenance procedures
U-00021/-/H81	283	record keeping/maintenance procedures
U-00021/-/H81	284	record keeping/maintenance procedures
U-00023/-/H07	302	record keeping/maintenance procedures
U-00023/-/H07	303	record keeping/maintenance procedures
U-00023/-/H07	304	record keeping/maintenance procedures
U-00025	356	record keeping/maintenance procedures
U-00025	357	record keeping/maintenance procedures
U-00025	358	record keeping/maintenance procedures
U-00025	359	record keeping/maintenance procedures
U-00048/-/I01	394	record keeping/maintenance procedures
U-00048/-/I01	395	record keeping/maintenance procedures
U-00048/-/I01	396	record keeping/maintenance procedures
U-00053	420	record keeping/maintenance procedures
U-00053/-/I35	427	record keeping/maintenance procedures
U-00053/-/I35	428	record keeping/maintenance procedures
U-00053/-/I35	429	record keeping/maintenance procedures
U-00053/325X3/I35/325AP	441	record keeping/maintenance procedures
U-00056	453	record keeping/maintenance procedures
U-00056	454	record keeping/maintenance procedures
U-00056/-/I33	457	record keeping/maintenance procedures
U-00056/-/I33	458	record keeping/maintenance procedures
U-00060	493	record keeping/maintenance procedures
U-00060	494	record keeping/maintenance procedures
U-00060	495	record keeping/maintenance procedures
U-00060	496	record keeping/maintenance procedures
U-00060	497	record keeping/maintenance procedures



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

U-00089	595	record keeping/maintenance procedures
U-00089	596	record keeping/maintenance procedures
U-00089	597	record keeping/maintenance procedures
FACILITY	57	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
U-00016	233	record keeping/maintenance procedures
U-00048/-/I50	398	record keeping/maintenance procedures
FACILITY	59	record keeping/maintenance procedures
FACILITY	60	record keeping/maintenance procedures
FACILITY	61	record keeping/maintenance procedures
FACILITY	62	work practice involving specific operations
FACILITY	63	record keeping/maintenance procedures
FACILITY	64	record keeping/maintenance procedures
U-00086	557	record keeping/maintenance procedures
U-00084	537	record keeping/maintenance procedures
FACILITY	48	record keeping/maintenance procedures
U-00011/-/E07	206	record keeping/maintenance procedures
U-00011/-/E07	207	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
U-00011/-/E07	208	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
F-AC003/-/CIL	75	record keeping/maintenance procedures
F-AC003/-/SIL	84	record keeping/maintenance procedures
F-AC003/-/CIL	76	record keeping/maintenance procedures
F-AC003/-/SIL	85	record keeping/maintenance procedures
F-AC003/-/CIL	77	record keeping/maintenance procedures
F-AC003/-/SIL	86	record keeping/maintenance procedures
F-AC003/-/CIL	78	record keeping/maintenance procedures
F-AC003/-/SIL	87	record keeping/maintenance procedures
F-AC003/-/CIL	79	record keeping/maintenance procedures
F-AC003/-/SIL	88	record keeping/maintenance procedures
F-AC003/-/EHG	82	record keeping/maintenance procedures
F-AC003/-/CIL	80	record keeping/maintenance procedures
F-AC003/-/SIL	89	record keeping/maintenance procedures
F-AC003	73	record keeping/maintenance procedures
U-00060/304B0/I45/30417	522	monitoring of process or control device parameters as surrogate
FACILITY	65	record keeping/maintenance procedures
FACILITY	66	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
U-00021	243	record keeping/maintenance procedures
U-00024	306	record keeping/maintenance procedures
U-00048	374	record keeping/maintenance procedures
U-00084	529	record keeping/maintenance procedures
U-00085	542	record keeping/maintenance procedures
U-00086	551	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
U-00008/-/K06	617	record keeping/maintenance procedures
U-00008/09503	106	record keeping/maintenance procedures
U-00086/319C1	580	record keeping/maintenance procedures
U-00011/053L6	216	monitoring of process or control device parameters as surrogate
U-00021/12007	286	monitoring of process or control device parameters as surrogate
U-00021/14201	288	monitoring of process or control device parameters as surrogate
U-00008/R1601/K06	161	monitoring of process or control device parameters as surrogate
U-00008/R1601/K06	162	record keeping/maintenance procedures
U-00012/030N1/P04/030AW	231	record keeping/maintenance procedures

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00021/11601	285	record keeping/maintenance procedures
U-00021/120A5	287	record keeping/maintenance procedures
U-00024/317R6/E52	328	record keeping/maintenance procedures
U-00024/317R7/E52/317CI	331	record keeping/maintenance procedures
U-00047/03810/P65/038AB	371	record keeping/maintenance procedures
U-00047/03816/P65/038AG	372	record keeping/maintenance procedures
U-00048/148X1	400	record keeping/maintenance procedures
U-00053/-/I35	421	record keeping/maintenance procedures
U-00056/304A8	461	record keeping/maintenance procedures
U-00060	465	record keeping/maintenance procedures
U-00084/308B7/G05	541	record keeping/maintenance procedures
U-00086	554	record keeping/maintenance procedures
U-00008/09601/K06/096AA	159	record keeping/maintenance procedures
U-00008/09601/K06/096AA	160	monitoring of process or control device parameters as surrogate
U-00086/319C1	581	record keeping/maintenance procedures
U-00008/-/K06/096AA	618	record keeping/maintenance procedures
U-00008/-/K06/096AA	619	monitoring of process or control device parameters as surrogate
U-00008/09503/K02	620	record keeping/maintenance procedures
U-00008/R1601/K06	621	record keeping/maintenance procedures
U-00008/R1601/K06	622	monitoring of process or control device parameters as surrogate
U-00009/322B1/H12	623	record keeping/maintenance procedures
U-00009/322B1/H12	624	record keeping/maintenance procedures
U-00009/322B1/H12	625	record keeping/maintenance procedures
U-00011	626	continuous emission monitoring (cem)
U-00011	627	continuous emission monitoring (cem)
U-00011	628	continuous emission monitoring (cem)
U-00011	629	continuous emission monitoring (cem)
U-00011/053L3	630	record keeping/maintenance procedures
U-00011/053L6	631	monitoring of process or control device parameters as surrogate
U-00011/053L6	632	record keeping/maintenance procedures
U-00011/053L8	633	record keeping/maintenance procedures
U-00021/11601	634	record keeping/maintenance procedures
U-00021/12007	635	monitoring of process or control device parameters as surrogate
U-00021/120A5	636	record keeping/maintenance procedures
U-00021/14201	637	monitoring of process or control device parameters as surrogate
U-00047/03816/P65/038AG	641	record keeping/maintenance procedures
U-00048/148X1	642	record keeping/maintenance procedures
U-00053/325X3	643	monitoring of process or control device parameters as surrogate
U-00053/325X3	644	record keeping/maintenance procedures
U-00056/304A8	645	record keeping/maintenance procedures
U-00060	646	record keeping/maintenance procedures
U-00060/303A8	647	monitoring of process or control device parameters as surrogate
U-00060/303B1	648	monitoring of process or control device parameters as surrogate
U-00060/303X1	649	monitoring of process or control device parameters as surrogate
U-00060/304B0	650	monitoring of process or control device parameters as surrogate
U-00060/304B0/I45	651	monitoring of process or control device parameters as surrogate
U-00060/304X1	652	monitoring of process or control device parameters as surrogate
U-00060/304X2	653	monitoring of process or control device parameters as surrogate
U-00061/01701	654	record keeping/maintenance procedures
U-00084	655	record keeping/maintenance procedures



New York State Department of Environmental Conservation  
Permit Review Report

Permit ID: 8-2614-00205/01801

Renewal Number: 1

08/19/2013

U-00084/308B5	656	record keeping/maintenance procedures
U-00008/09503	105	record keeping/maintenance procedures
U-00008/09504/K06/095AG	157	monitoring of process or control device parameters as surrogate
U-00008/09508/K06/095AJ	158	monitoring of process or control device parameters as surrogate
U-00011	201	monitoring of process or control device parameters as surrogate
U-00011/05327/E06	215	record keeping/maintenance procedures
U-00011/053L9/E06	218	record keeping/maintenance procedures
U-00012/-/P04	221	monitoring of process or control device parameters as surrogate
U-00012/03054/P03/030AC	224	record keeping/maintenance procedures
U-00012/03055/P03/030AD	225	record keeping/maintenance procedures
U-00012/03062/P03/030AH	226	record keeping/maintenance procedures
U-00012/030L0/P03/030AM	227	record keeping/maintenance procedures
U-00012/030L1/P03/030AN	228	record keeping/maintenance procedures
U-00012/030L4/P03/030AQ	229	record keeping/maintenance procedures
U-00012/030M9/P03/030AV	230	record keeping/maintenance procedures
U-00023	292	monitoring of process or control device parameters as surrogate
U-00023/112A1/H06/112AC	305	monitoring of process or control device parameters as surrogate
U-00024	307	monitoring of process or control device parameters as surrogate
U-00024/-/E52	309	record keeping/maintenance procedures
U-00024/-/E52	310	monitoring of process or control device parameters as surrogate
U-00024/-/E52	311	monitoring of process or control device parameters as surrogate
U-00024/317E7/E52/317ED	326	monitoring of process or control device parameters as surrogate
U-00024/317F0/E52/317EG	327	monitoring of process or control device parameters as surrogate
U-00024/317R6/E52/317CH	329	monitoring of process or control device parameters as surrogate
U-00024/317R7/E52/317CI	330	monitoring of process or control device parameters as surrogate
U-00024/317W3/E52/317DL	332	monitoring of process or control device parameters as surrogate
U-00025/-/S05	360	monitoring of process or control device parameters as surrogate
U-00032	362	monitoring of process or control device parameters as surrogate
U-00048	375	monitoring of process or control device parameters as surrogate
U-00053	401	monitoring of process or control device parameters as surrogate
U-00053/325X3	434	monitoring of process or control device parameters as surrogate
U-00056/304A8/I33	463	monitoring of process or control device parameters as surrogate
U-00060/-/I24	498	monitoring of process or control device parameters as surrogate
U-00060/-/I25	499	record keeping/maintenance procedures
U-00060/-/I27/304AA	500	record keeping/maintenance procedures
U-00060/-/I27/304AA	501	record keeping/maintenance procedures
U-00060/-/I27/304AB	502	record keeping/maintenance procedures
U-00060/-/I27/304AB	503	record keeping/maintenance procedures
U-00060/-/I28	504	monitoring of process or control device parameters as surrogate
U-00060/303A8/I26/303AE	509	monitoring of process or control device parameters as surrogate
U-00060/304B0/I45/30410	520	monitoring of process or control device parameters

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



**Permit ID: 8-2614-00205/01801**  
**Renewal Number: 1**  
**08/19/2013**

U-00060/304B0/I45/30411	521	as surrogate
U-00060/337A2/I51/337AA	526	record keeping/maintenance procedures
		monitoring of process or control device parameters
U-00075/08224	527	as surrogate
		monitoring of process or control device parameters
U-00084	530	as surrogate
		monitoring of process or control device parameters
U-00085	543	as surrogate
		monitoring of process or control device parameters
U-00086	552	as surrogate
		monitoring of process or control device parameters
U-00087	583	as surrogate
		monitoring of process or control device parameters
U-00087/-/N10	585	as surrogate
		monitoring of process or control device parameters
U-00087/349D2/N10/349CA	590	as surrogate
		monitoring of process or control device parameters
U-00087/349E0/N10/349CK	591	as surrogate
U-00087/349H4/N44/349EG	592	record keeping/maintenance procedures
		monitoring of process or control device parameters
U-00087/349H9/N44/349EL	593	as surrogate
		monitoring of process or control device parameters
U-00008	90	as surrogate
U-00011	202	record keeping/maintenance procedures
U-00012	220	record keeping/maintenance procedures
U-00016	232	record keeping/maintenance procedures
U-00023	293	record keeping/maintenance procedures
U-00024/-/E52	312	record keeping/maintenance procedures
U-00025/-/S05	361	record keeping/maintenance procedures
U-00032	363	record keeping/maintenance procedures
U-00048	376	record keeping/maintenance procedures
U-00053	402	record keeping/maintenance procedures
U-00056/304A8/I33	464	record keeping/maintenance procedures
U-00060/30105	507	record keeping/maintenance procedures
U-00075/08224	528	record keeping/maintenance procedures
U-00084	531	record keeping/maintenance procedures
U-00085	544	record keeping/maintenance procedures
U-00086	553	record keeping/maintenance procedures
U-00087	584	record keeping/maintenance procedures
F-AC001	70	record keeping/maintenance procedures
F-AC002/-/DSL	71	record keeping/maintenance procedures
		monitoring of process or control device parameters
F-AC002/-/NGS	72	as surrogate
		monitoring of process or control device parameters
F-AC003/-/CIL	74	as surrogate
		monitoring of process or control device parameters
F-AC003/-/EHG	81	as surrogate
		monitoring of process or control device parameters
F-AC003/-/SIL	83	as surrogate
		monitoring of process or control device parameters
U-00024/351C8/E63/351AP	335	as surrogate
U-00084/-/G02/308AB	538	intermittent emission testing
U-00024/-/E63/351AP	639	intermittent emission testing
F-AC002	604	record keeping/maintenance procedures
U-00024/-/E63/351AP	640	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
U-00011/-/E08	214	record keeping/maintenance procedures
U-00024/-/E55	317	record keeping/maintenance procedures
U-00024/-/E62	323	record keeping/maintenance procedures
U-00047/-/P61	370	record keeping/maintenance procedures
U-00084	535	record keeping/maintenance procedures
U-00085/-/S21	549	record keeping/maintenance procedures
U-00011/-/E08	209	continuous emission monitoring (cem)

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



**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

U-00011/-/E08	210	continuous emission monitoring (cem)
U-00024/-/E62	318	record keeping/maintenance procedures
U-00047/-/P61	365	record keeping/maintenance procedures
U-00084/-/G10	540	record keeping/maintenance procedures
U-00011	203	record keeping/maintenance procedures
U-00024/-/E55	313	record keeping/maintenance procedures
U-00024/-/E62	319	record keeping/maintenance procedures
U-00047/-/P61	366	record keeping/maintenance procedures
U-00084	532	record keeping/maintenance procedures
U-00085/059K4/S21/059AX	550	record keeping/maintenance procedures
U-00086/319C1/J50	582	record keeping/maintenance procedures
U-00011/-/E08	211	record keeping/maintenance procedures
U-00011/053L6/E08	217	monitoring of process or control device parameters as surrogate
FACILITY	36	record keeping/maintenance procedures
U-00024/-/E55	316	work practice involving specific operations
U-00024/-/E62	322	work practice involving specific operations
U-00047/-/P61	369	work practice involving specific operations
U-00084/-/G08	539	work practice involving specific operations
U-00085/-/S21	548	work practice involving specific operations
F-AC004/-/AD1	606	record keeping/maintenance procedures
F-AC004/-/AD1	607	monitoring of process or control device parameters as surrogate
F-AC004/-/AD1	608	monitoring of process or control device parameters as surrogate
F-AC004/-/AD1	609	record keeping/maintenance procedures
F-AC004/-/AD1	610	record keeping/maintenance procedures
F-AC004	605	record keeping/maintenance procedures
F-AC004/-/AD2	614	record keeping/maintenance procedures
F-AC004/-/AD1	612	record keeping/maintenance procedures
F-AC004/-/AD3	616	record keeping/maintenance procedures
U-00008/-/K04/091AE	103	record keeping/maintenance procedures
U-00012/-/P15	222	record keeping/maintenance procedures
U-00021	244	record keeping/maintenance procedures
U-00053/-/I47	431	record keeping/maintenance procedures
U-00056/-/I48	459	record keeping/maintenance procedures
U-00060/-/I49	505	record keeping/maintenance procedures
U-00086/-/J56	578	record keeping/maintenance procedures
U-00087/-/N40/349DA	586	record keeping/maintenance procedures
U-00087/-/N43	588	record keeping/maintenance procedures
U-00008/-/K04	102	record keeping/maintenance procedures
U-00012/-/P15	223	record keeping/maintenance procedures
U-00053/-/I47	432	record keeping/maintenance procedures
U-00056/-/I48	460	record keeping/maintenance procedures
U-00060/-/I49	506	record keeping/maintenance procedures
U-00086/-/J56	579	record keeping/maintenance procedures
U-00087/-/N40/349DA	587	record keeping/maintenance procedures
U-00087/-/N43	589	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
U-00024/317X5	333	monitoring of process or control device parameters as surrogate
U-00024/317X7	334	monitoring of process or control device parameters as surrogate
U-00045/08212	364	monitoring of process or control device parameters as surrogate
U-00047/03818	373	monitoring of process or control device parameters as surrogate
U-00053/-/I35/325AT	430	monitoring of process or control device parameters as surrogate
U-00056/304A8	462	monitoring of process or control device parameters as surrogate
U-00060/303A8/I26	508	monitoring of process or control device parameters as surrogate



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

**Permit ID: 8-2614-00205/01801  
Renewal Number: 1  
08/19/2013**

U-00060/303X2/I26	513	monitoring of process or control device parameters as surrogate
U-00060/30403/I27	514	monitoring of process or control device parameters as surrogate
U-00060/304B0/I45	518	monitoring of process or control device parameters as surrogate
U-00060/304B0/I45	519	monitoring of process or control device parameters as surrogate
U-00084	536	monitoring of process or control device parameters as surrogate
U-00085	545	monitoring of process or control device parameters as surrogate
U-00086	555	monitoring of process or control device parameters as surrogate
U-00025	336	record keeping/maintenance procedures
U-00048	377	record keeping/maintenance procedures
U-00053	403	record keeping/maintenance procedures
U-00056	442	record keeping/maintenance procedures
U-00060	466	record keeping/maintenance procedures
U-00025	337	record keeping/maintenance procedures
U-00048	378	record keeping/maintenance procedures
U-00053	404	record keeping/maintenance procedures
U-00056	443	record keeping/maintenance procedures
U-00060	467	record keeping/maintenance procedures
U-00053	405	record keeping/maintenance procedures
U-00060	468	record keeping/maintenance procedures

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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.

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

This facility-specific condition includes Kodak's "Operational Flexibility Plan" which 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. The Operational Flexibility Plan included in the Renewal permit ("Ren 1") is a revision of the earlier permitted plan. The purpose of the revisions was to make the condition more concise and to more accurately reflect the notification process developed under the plan. No substantive changes have been made to the protocol criteria or other requirements under the plan.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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; and
- 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.

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

In this Renewal Permit, a permit condition which states the requirements for alternate operating scenarios described above, has been included for EU U-00021, U-00024, U-00048, U-00084, U-00085 & U-00086.

**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)**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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)**

For emission points having authorized emissions which exceed the thresholds for a required percentage of control according to Tables 2, 3, or 4 of Part 212, conditions are included in the permit which specify monitoring requirements for control devices and/or process parameters. In some cases where it has been demonstrated that it is not feasible to meet the specified control percentage, a BACT analysis is conducted and a condition specifying an alternate limit and record keeping requirements is included in the permit as allowed by 212.5(d).

For emission points having authorized emissions below the thresholds for specified level of control under Tables 2,3 or 4 of Part 212, a general condition stating that these thresholds would not be exceeded was included in the permit. In previous versions of Kodak's Title V Permit, this general Part 212.4(a) condition was widespread- often repeated numerous times within an Emission Unit. In an effort to streamline the permit and eliminate this redundancy, the same general condition has been moved to the facility level. Kodak will continue to maintain records of their emissions in order to comply with this condition just as they currently do.

This Renewal Permit includes revised Part 212.4(a) compliance monitoring conditions for EP 325X3 in EU U-00053. Previously, emission sources located in this Synthetic Chemicals manufacturing area were controlled with a biological oxidation system, called the Bioton. This equipment deteriorated over approximately 15 years of use and is no longer cost effective to operate. References to the Bioton in the permit have been removed. Monitoring requirements for Part 212 regulated toxics remain in the permit under this citation, and include lower emission limits than previously permitted.

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.

Pursuant to Order on Consent R8-20010314-10, Kodak satisfied Part 212.4(a) requirements by installing a single stage caustic scrubber system on their Silver Recovery Roaster (ES 101AJ). Once all testing and reporting required under the Consent Order was complete, operating parameters for the new scrubber were established which will ensure that control efficiencies demonstrated by the testing is maintained. Permit conditions are included in EU U-00063 for ES 101AJ which document these operating requirements for the following applicable contaminants: Nitrogen Oxide, Sulfur Dioxide, Sulfuric Acid, Hydrogen Chloride and Hydrogen Bromide. The Consent Order also listed Chlorine, Arsenic, Cadmium, and Nickel as Part 212 applicable because at the time predicted levels of these contaminants were above the Ambient Guideline Concentrations (AGCs). According to Kodak's more recent assessment(10/17/08), emissions of these four contaminants have decreased such that predicted ambient levels are below the AGCs. Based on 2005 test results, the potential emission rate for each of these contaminants from the Roaster is less than 0.1 lb/hr.

**6NYCRR Part 212.4(b)**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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 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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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 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.

Emission source 095AF, Kodak's Multiple Hearth Incinerator (MHI) which is used to incinerate wastewater sludge and grit from the King's Landing Wastewater Treatment Plant, is subject to the NO<sub>x</sub> RACT requirements under this citation. Based on the most recent evaluation of available control options, a NO<sub>x</sub> limit and record keeping requirements are included in the permit. The Renewal 1 permit includes some revisions to the monitoring condition to simplify the calculation algorithm associated with the monthly emission calculations as described in Kodak's April 4, 2011 Notification of Change letter.

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

Emission Points which are equipped with a capture system and control device are required to demonstrate compliance with the 81% overall removal efficiency for volatile organic compounds (VOCs). For certain types of control devices the rule specifies continuous monitoring parameters. Other parameters may be required by permit conditions to be monitored as deemed necessary to fit facility-specific equipment and operating conditions.

For the Building 53 Carbon Adsorber System (EU U-00011/ EP 053L6), the breakthrough concentration of VOCs on the carbon absorption unit is monitored as per 212.11(b)(3). The upper limit for the breakthrough concentration is based on the most recent data correlating to an 81% VOC removal efficiency. A permit condition limiting the total hydrocarbon (THC) breakthrough concentration to 25 ppm has been included in this Renewal (Ren 1) permit based on studies done over 2010- 2011. These studies (referenced in Kodak's June 1, 2011 Notification of Change letter) were undertaken to better understand the current capabilities of the carbon adsorber as acetate film operations exhausted to the control system decline.

Since the Title V permit was originally issued in 2/03, the permit has required that "the breakthrough concentration shall not exceed 400 ppm by volume". In 2003, the PLC system initiated the bed regeneration cycle (and change to a new carbon bed) when the outlet concentration of the bed was greater than or equal to 100 ppm THC, or every four hours, whichever occurred first. Based upon inquiry of operating personnel, vessel changeover generally occurred every four hours in 2003, and rarely reached or exceeded 100 ppm THC. Since this time, the overall VOC loading to the B-53 CAS has decreased, and while the 100 ppm process limit has been intact, the adsorb time criteria has been shifted in order to achieve energy reductions. Since the performance test in 6/03, various other process changes have occurred (ducting of additional process to the CAS, shutdown of sources), however, these changes are not expected to impact the ability to satisfy the 81% ORE requirement for Part 212-regulated sources.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

For the refrigerated vent condenser located at Distilling West operations (EU U-00009/ EP 322B1), the outlet gas temperature (or coolant temperature) must be monitored and maintained below a limit which ensures 81% VOC removal as per 212.11(b)(4). For the scrubber system at Distilling West, flow and recirculation rates demonstrated during required MON MACT testing were used for the basis of ensuring VOC controls. Since this equipment is subject to the same monitoring requirements under the MON MACT rule, the Part 212 VOC RACT requirements have been included under the Subpart FFFF permit conditions.

For scrubber systems located in Distilling East (EU U-00021/ EP 12007 and EP 14201), permit conditions which specify continuous monitoring and minimum flow and recirculation rates have been included to ensure 81% VOC removal efficiency.

For the afterburner on the Silver Recovery Roaster (EU U-00063/ EP 101A2), the minimum exhaust gas temperature must be monitored per 212.11(b)(1). A permit condition has been included to specify the minimum exhaust temperature to ensure 81% removal of VOC as demonstrated during testing.

**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.

This Renewal Permit includes revised Part 212 RACT compliance monitoring conditions for EP 325X3 in EU U-00053. Previously, emission sources located in this Synthetic Chemicals manufacturing area were controlled with a biological oxidation system, called the Bioton. This equipment deteriorated over approximately 15 years of use and is no longer cost effective to operate. References to the Bioton in the permit have been removed. VOC monitoring requirements remain in the permit under this citation, and include a lower emission limit than previously permitted.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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).

**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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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 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 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 228-1 Surface Coating Processes**

**6NYCRR Part 228-1.1(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. Currently, operations in EU U-00020, U-00084, and U-000085 use the low volume specialty coating exemption.

**6NYCRR Part 228-1.3(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 228-1.3(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 228-1.3(d)**

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

**6NYCRR Part 228-1.3(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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**6NYCRR Part 228-1.4**

The regulation of opacity at 6 NYCRR Part 228.4 does not specify periodic monitoring. Therefore, the permit 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 228-1.5(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 228-1.5(g)**

Requires continuous monitoring of VOC emission control devices to ensure that an overall removal efficiency of 85% is achieved. Conditions specify that continuous monitors must be installed, calibrated and maintained. Key operating parameters are specified in the rule for different types of control devices.

For the Building 53 Carbon Adsorber System (Control Device 05302) permitted under EU U-00011, the condition specifies that breakthrough of VOCs on the carbon absorption unit is monitored according to paragraph 228-1.5(g)(3). The breakthrough concentration is based on the most recent data correlating to an 85% VOC removal efficiency. A permit condition limiting the total hydrocarbon (THC) breakthrough concentration to 25 ppm has been included in this Renewal (Ren 1) permit based on studies done over 2010- 2011. These studies (referenced in Kodak's June 1, 2011 Notification of Change letter) were undertaken to better understand the current capabilities of the carbon adsorber as acetate film operations exhausted to the control system decline.

For the Regenerative Thermal Oxidizer (RTO)(Control ID 31903) permitted under EU U-00086, the condition requires continuous monitoring of the combustion chamber temperature to maintain the three hour block average at or above 1600 degrees F. This monitoring condition is based on the demonstration of compliance with the 85% control efficiency shown during the required testing conducted on March 28, 2007.

**6 NYCRR Part 228-1.5(j)**

This new monitoring condition requires that the Department be notified of any instances of non-compliance with the Part 228 rule within 30 days of finding the compliance problem.

**6NYCRR Part 228-1.7**

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.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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 228-1.10**

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 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 228-2 Commercial and Industrial Adhesives, Sealants and Primers**

**6NYCRR Part 228-2.3(e)**

This monitoring condition reflects the language in the regulation under 228-2.3(e)(1) and (2) to explain which VOC content applies under different adhesive-substrate applications.

**6NYCRR Part 228-2.3(f)(1)**

This monitoring condition limits the VOC content of the surface preparation solvent as stated in the regulation.

**6NYCRR Part 228-2.3(f)(3)**

This monitoring condition specifies the vapor pressure limit of the cleanup solvent as stated in the regulation.

**6NYCRR Part 228-2.4**

Monitoring conditions included under this citation state the requirements and criteria for meeting the exemptions from the rule.

**6NYCRR Part 228-2.5(d)**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

This condition describes the record keeping requirements when the lab exemption is being used under 228-2.4(a)(1).

**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 231 New Source Review for New and Modified Facilities**

**6NYCRR Part 231-2 Requirements for Emission Units Subject to the Regulation On or After November 15, 1992 and Prior to the Effective Date of Subparts 231-3 through 231-13**

**6NYCRR Part 231-2.2(d)(3)**

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

New Source Review project caps for emissions of VOC and Particulate emissions, which were included in the permit under EU U-00083 when numerous sources were moved from the old Elmgrove Facility to Kodak Park ("Janus Project"), have been removed from this Title V Renewal Permit ("Ren 1"). These caps were no longer relevant since many of the applicable sources have been shut down. The total potential emissions of the remaining 8 capped sources was well below NSR thresholds. If not for the Janus project NSR applicability/cap, most the sources would have been exempt from permitting. With the cap removed, remaining sources have been exempt. Remaining non-exempt sources in Bldg 308 which were permitted under EU U-00083 have been moved to EU U-00084 where other related Bldg 308 sources are permitted. Documentation to support the removal of these NSR emission limits (Conditions 2-356 & 942), including the potential emissions and exempt status of some sources, was provided in Kodak's Nov 30, 2009 Amendment to the Title V Renewal Application for EU U-00083 and U-00084.

For EU U-00045, Emission Point 08212, a New Source Review cap of 38.7 tpy VOC is included under this citation. When this emissions limitation was originally authorized on May 12, 1993, the project included the following emission sources: (1) CS coating machine Emission Source 082AJ, 2) "YASUI Lab Coater" (which has been dismantled), (3) "Room 300 Drying Oven", and (4) "Room 312 Coating of Glass" (which has been discontinued). Emission sources (3) and (4) were determined to have a maximum emission rate potential of 1.2 tons per year VOCs. Therefore, the coating machine (1) and lab coater (2) were limited to 38.7 tpy for an effective cap of 39.9 tons per year for the project. The YASUI Lab Coater (2), "Room 300 Drying Oven" and (4) "Room 312 Coating of Glass" operations have all been shut down.

**6NYCRR Part 231-2.12**

Three Special Conditions in the permit document a total of 62.1 tons of Volatile Organic Compound (VOC) Emission Reduction Credits (ERCs) established through permanent shut down of VOC-emitting processes.

After this Renewal permit was Proposed, a Consent Agreement and Final Order (CAFO) was issued by the USEPA which included, as part of the penalty agreement, the retirement of one hundred eleven and one tenth (111.1) NYS VOC Emission Reduction Credits (ERCs) that are currently registered to Kodak. The permitted 62.1 tons of ERCs mentioned above were included in the quantity of retired under this CAFO.

**6 NYCRR Part 231-11 Permit and Reasonable Possibility Requirements**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**6 NYCRR Part 231-11.2**

The "Reasonable Possibility" provisions of the revised Part 231 rule have been included under the 231-11.2(b) and (c) citations. These conditions explain that in the case that a project potential is evaluated using the *projected actual* emissions, rather than potential emissions (PTE), additional record keeping is required. Because no specific project has triggered these requirements at the time of the Draft Renewal 1 Title V Permit, these two conditions are included, generically, at the facility level.

**6 NYCRR Part 233 Pharmaceutical and Cosmetic Manufacturing**

In order to accommodate new business opportunities to produce chemicals for use by pharmaceutical and cosmetics manufacturers using existing equipment in Kodak's Synthetic Chemicals Manufacturing facilities, conditions have been added to the Renewal permit ("Ren 1") under Emission Units: U-00025, U-00048, U-00053, U-00056 and U-00060 to specify the applicable operating requirements and VOC limits.

**6 NYCRR Part 233.3**

Under this citation, conditions have been added to the permit for EU U-00025, U-00048 and U-00056 to address the control requirements of paragraphs 233.3(a), (b), (e) and (f). The Synthetic Chemical small scale operations, represented by these three emission units, will operate under the 233.1(g)(2) exemption for reactors, extractors, distillation operations, crystallizers, centrifuges or vacuum dryers and below the threshold for the 233.3(b) control requirements for air dryers and production equipment exhaust systems.

Also under this citation, conditions have been added to the permit for EU U-00053 and U-00060 to address the control requirements of paragraphs 233.3(e) and (f) for centrifuges, filters and in-process tanks used for the manufacture of chemicals pharmaceutical or cosmetic products.

Because the equipment included under EUs U-00053 and U-00060 is not compliant with the control requirements of paragraphs 233.3(a) and (b), these operations will operate under a process specific RACT demonstration in accordance with 233.3(h) when manufacturing chemicals for pharmaceutical or cosmetic products. Paragraph 233.3(a) specifies the maximum outlet temperature for surface condensers associated with reactors, extractors, distillation operations, crystallizers, centrifuges, and vacuum dryers. Depending on the VOCs used, Kodak's condensers will not consistently meet these temperature limits. Paragraph 233.3(b) requires 90% control (or reduction to 33 lbs/day) for VOC emissions from air dryers and production equipment exhaust systems, which Kodak's equipment does not have. Instead, conditions have been added to specify the facility-specific RACT determination under 233.3(h)(1), as described below.

Kodak will not be using any VOC transfer equipment or any storage tanks in the production of pharmaceutical or cosmetic products that would be subject to the control requirements of 233.3(c) or 233.3(d), respectively.

**6 NYCRR Part 233.3(g)**

Conditions under this citation have been included for Emission Units U-00025, U-00048, U-00053, U-00056 and U-00060 to specify the leak repair requirements for equipment subject to Part 233. The facility is required to repair all liquid leaks containing VOC's no later than 15 days after discovering the leak. The facility is allowed to wait until the process is shut down if it is impossible to fix it otherwise. Records must be kept to show that these leak requirements have been met.

**6 NYCRR Part 233.3(h)(1)**

A condition has been included for Kodak's Synthetic Chemicals -West (Bldg 325) large scale operations (EU U-00053) under this citation. This equipment will operate under a 233.3(h) process specific RACT determination for surface condensers associated with reactors, extractors, distillation operations,



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

crystallizers, centrifuges, and vacuum dryers. This equipment is already subject to VOC RACT under Part 212. The RACT evaluation completed in September, 2008 determined that process changes to upgrade the condensers to reduce coolant temperatures was not cost effective and that existing cooling for these condensers was RACT. Some of the equipment in Bldg 325 has surface condensers that use Chilled Water. All other surface condensers in Bldg 325 use Kodak Water. Bldg 325 does not have any surface condensers that use Glycol. To lower the VOC emissions, upgrading condensers to use Chilled Water or refrigerated ethylene glycol/water solution (Glycol) was among the options included in the RACT evaluation. The proposed condition includes maximum temperature limits for the Bldg 325 Chilled Water and Kodak Water condensers (10 C and 25 C, respectively) and temperature monitoring requirements to optimize VOC controls using the existing equipment.

Air dryers and production equipment exhaust systems in Bldg 325 can be interchangeably used to produce either Part 212 or Part 233 products. This equipment will also operate under a 233.3(h) process specific RACT determination when used to produce pharmaceutical or cosmetic products. The September 2008 RACT evaluation included assessment of technically feasible control options for various source configurations. None of these options were found to be cost effective. Therefore, the VOC emissions were limited to current baseline of 66 tpy, consistent with the existing Part 212 RACT limit. Emissions resulting from Part 233 operations will be calculated and included under the existing 66 tpy cap.

A second condition under this citation has been included for Kodak's Synthetic Chemicals -North (Bldgs 301-304) large scale operations (EU U-00060). These operations will operate under a 233.3(h) process specific RACT determination for surface condensers associated with reactors, extractors, distillation operations, crystallizers, centrifuges, and vacuum dryers. This equipment is already subject to VOC RACT under Part 212. The RACT evaluation completed in September, 2010 determined that process changes to upgrade the condensers to reduce coolant temperatures was not cost effective and that existing cooling for these condensers was RACT. Some surface condenser in Bldg 301-304 that have surface condensers that use Glycol. All other surface condensers in Bldg 301-304 use Kodak Water. Bldg 301-304 does not have any surface condensers that use Chilled Water. The use of Chilled Water or Glycol was among the options included in the RACT evaluation. The proposed condition includes maximum temperature limits for the Bldg 301-304 Glycol and Kodak Water condensers (-10 C and 25 C, respectively) and temperature monitoring requirements to optimize VOC controls using the existing equipment.

Air dryers and production equipment exhaust systems in Bldg 301 - 304 can be interchangeably used to produce either Part 212 or Part 233 products. This equipment will also operate under a 233.3(h) process specific RACT determination when used to produce pharmaceutical or cosmetic products. The September 2010 RACT evaluation included assessment of technically feasible control options for various source configurations. None of these options were found to be cost effective. Therefore, the VOC emissions were limited to the current baseline of 150 tpy, consistent with the existing Part 212 RACT limit. Emissions resulting from Part 233 operations will be calculated and included under the existing 150 tpy cap.

**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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

sampling and analysis to demonstrate compliance with the VOC content limit. As allowed under 234.4(b)(2), 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/manufacturer 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.

**6NYCRR Part 236 SOCM I Equipment Leaks**

EU U-00009 newly added process produces methanol, triggering Part 236 applicability. In accordance with paragraph 236.2(c), compliance with the MON rule can be used to satisfy equal or less stringent component leak requirements of 6 NYCRR Part 236.

**6NYCRR Part 249 Best Available Retrofit Technology**

A non-applicability determination has been included in the permit to document that Kodak's BART-eligible emission sources of SO<sub>2</sub>, NO<sub>x</sub> and Particulate Matter at Eastman Business Park are not subject to 6NYCRR Part 249 as determined by the Department. The specific sources are documented in a letter from Michael Zapkin, Kodak to Robert Sliwinski, NYSDEC dated September 9, 2010. The Department's determination that these units meet the exemption requirements in 6NYCRR Part 249.1(c)(3) is documented in a response letter from Robert Sliwinski, NYSDEC to Michael Zapkin, Kodak (Subject: BART Eligibility Analysis for Eastman Kodak Company Small Emission Sources at Eastman Business Park).

**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, NO<sub>x</sub>, Particulate, Sulfur Dioxide and Fluoride.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

In previous versions of Kodak's Title V Permit, conditions cited under 40 CFR Part 52 limited the potential increase of applicable contaminants from a project below certain "significance thresholds" for PSD. These PSD "caps", which allow projects with restricted emissions to go forward without triggering additional PSD requirements, have been moved to the corresponding Part 231 citation (6 NYCRR Part 231-2.2(d)) now that the State's Part 231 rule includes the PSD provisions and has been incorporated into NY's State Implementation Plan (SIP).

In accordance with Consent Order #R8-20010314-10, Kodak satisfied PSD requirements by installing a single stage caustic scrubber system on their Silver Recovery Roaster (ES 101AJ). Once all testing and reporting required under the Consent Order was complete, operating parameters for the new scrubber were established which will ensure that control efficiencies demonstrated by the testing is maintained. Permit conditions are included in EU U-00063 for ES 101AJ which document these operating requirements.

New Source Review project caps for emissions of VOC and Particulate emissions, which were included in the permit under EU U-00083 when numerous sources were moved from the old Elmgrove Facility to Kodak Park ("Janus Project"), have been removed from this Title V Renewal Permit ("Ren 1"). These caps were no longer relevant since many of the applicable sources have been shut down. The total potential emissions of the remaining capped sources was well below NSR thresholds. If not for the Janus project NSR applicability/cap, most the sources would have been exempt from permitting. With the cap removed, the few remaining sources have been exempt. Documentation to support the removal of these NSR caps, including the potential emissions and exempt status of some sources, was provided in Kodak's Nov 30, 2009 Amendment to the Title V Renewal Application for EU U-00083 and U-00084.

**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.

**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**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**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 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.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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

**40 CFR 63-A General Provisions**

Kodak operates sources subject to various Subpart 40CFR63 MACT rules and must also comply with the requirements of Subpart A of Part 63. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. Applicability of Subpart A is identified in the appropriate Table in each Subpart. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

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

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

Specifies work practice requirements for cold solvent cleaning machines.

Emission sources 053CA and 053CB are both equipped with lip exhaust located beneath the tight-fitting covers. The lip exhaust operates during the filling of the batch cold cleaners, whereupon solvent emissions are exhausted to the B-53 Carbon Absorber System (Control ID 05302). While Subpart T does have provisions for use of carbon adsorption for batch vapor and in-line cleaning machines, the regulation has no similar compliance provisions for batch cold cleaning units. On 4/11/2005, Kodak submitted a Request for Equivalent Method of Control to the USEPA to allow venting of Emission Sources 053CA and 053CB to the B-53 Carbon Adsorber System. Kodak is awaiting EPA's response on this request.

**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-T.471(b)(2)**

The permit includes a 60,000 kg/year facility-wide limit for total emissions of methylene chloride (MC) used in the solvent cleaning machines subject to this rule, according to 63.471 Table 1 for "general population degreasing machines". Kodak does not use the other HAPs (PCE and TCE) subject to the rule. This facility-level permit condition specifies requirements for demonstrating compliance with this limit by referencing the calculation methodology in 63.471(c)(1) - (5). This same condition also includes the requirements for reporting exceedances (63.471(d)) and record retention (63.471(e)).

On June 2, 2010, Kodak submitted a "Request for Equivalent Method of Control Determination" to USEPA to propose that the necessary compliance evaluation associated with the 12-month rolling total limit be done "on a monthly basis" rather than the "first operating day of each month" as specified by 63.471(c)(5). Kodak is concerned that "first operating day" is not defined in the rule and may be difficult to determine when dealing with several applicable sources with different employee staffing schedules. Kodak is awaiting EPA's response to this request.

**40 CFR 63-T.471(b)(c)**

This condition specifies the record keeping procedures for demonstration of compliance with the facility wide methylene chloride limit.

**40 CFR 63-T.471(h)**

This condition specifies the requirement to submit a solvent emission report to show compliance with the 12-month rolling total limit on an annual basis. Since a timeframe for submission of an annual report is not specified but may be changed or agreed upon with the Administrator, Kodak's requested annual due date of February 15th has been incorporated into the condition.

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



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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

Kodak may accept wastewater containing HAPs from off-site for treatment at King's Landing (EU U-00008). The Off-Site Waste MACT rule provides an exemption for facilities that receive less than one (1) megagram of HAP per year in off-site waste in accordance with the provisions of this citation. A monitoring condition has been included to describe the requirements to identify the exempt units and document HAP containing wastes from off-site.

Non applicability determinations for Subpart DD requirements have been included in the permit for Emission Units U-00009 and U-00021. Used solvents are brought from offsite for recovery at Kodak's two distillation operations. These solvent recovery operations do not meet the applicability criteria of 40 CFR 63 Subpart DD. 680. These solvent recovery operations are not considered "waste management operations", nor do they involve processing of waste oil. The operations are not exempt from applicable regulation of hazardous waste treatment, disposal, and storage facilities. The U-0009 and U-00021 distillation equipment is subject to the requirements of 40 CFR 63 Miscellaneous Organic NESHAP (MON MACT).

**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.

**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)**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

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**

Kodak's thermal media operations in Bldg 319 (EU U-00086) are subject to Subpart KK requirements. In order to comply with this rule, emissions from the coating machine are captured and controlled by a regenerative thermal oxidizer (RTO).

**40 CFR 63- KK.825(d)(1)**

A condition at this citation specifies how Kodak will determine the organic HAP emission rate based on material applied. As allowed under 63.827(b)(2)(iii), Kodak will use formulation data to determine the weight fraction organic HAP of a material.

**40 CFR 63-KK.825(g)**

A monitoring condition under this citation specifies the method of determining organic HAP emissions from a press or group of presses having one or more intermittently controlled work stations in accordance with the procedures in 63.825(f)(3).

**40 CFR 63-KK.825(f)(3)(i)**

Section 825 of the rule includes the ongoing requirements which reflect the monitoring conditions demonstrated during the performance testing. A monitoring condition has been included under this citation to require the continuous monitoring of the RTO temperature above 1600 degrees as demonstrated during the March 2007 test.

**40 CFR 63-KK.825(f)(3)(ii)**

A monitoring condition has been included under this citation to require the continuous monitoring of the coating room differential pressure less than -0.02 inches of water as demonstrated during the March 2007 performance test.

Another monitoring condition under this same citation requires continuous monitoring of the RTO bypass damper to ensure that it remains in the closed position during machine operation. Automatic process controls will shut down the machine if the bypass opens.

**40 CFR 63-KK.828(a)**

Emissions from all printing stations are captured in a common exhaust system and are directed to the RTO. This system has only one bypass vent (associated with the RTO), not multiple bypass vents for each dryer. Therefore, a condition at this citation specifies that the machine will shut down automatically if flow is diverted away (bypasses) from control device.

**40 CFR 63-KK.830(b)(5)**

A condition under this citation specifies the requirements of the Start up, Shut down, Malfunction Plan (SSMP) as stated in the rule.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**40 CFR 63-KK.830(b)(6)**

A condition under this citation specifies the requirements of the semiannual Summary Report as stated in the rule. In Kodak's case, Items ii-iv of the condition are included for completeness but are not applicable to the source.

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

A record keeping condition under this citation has been added to the Permit for EU U-00084 DPC Coating Machine (Emission Source 308AA) to demonstrate that the minimal amount of rotogravure printing performed on this machine is eligible to be excluded from Subpart KK requirements. As explained in Kodak's Minor Modification application, dated July 2, 2010, the DPC coating machine are potentially subject to Subpart KK MACT requirements because it is capable of making "patterned" coatings (i.e. "printing") as well as continuous web coatings. However, the amount of commercial "printing" done on the DPC Coating Machine is expected to be less than 5% of the total solvent use on the machine. Under 63.821(a)(2)(ii), this coating line may be excluded from the Subpart KK requirements provided that records be kept in accordance with 63.829(f).

Similarly, the GC1 coating machine which was also permitted for limited commercial production as part of the same Minor Modification (application dated 7/2/10), is potentially subject to Subpart KK, but will manufacture only "de minimus" amounts of product for commercial sale and meets the exemption pursuant to 63.820(b).

Note: Per 63.822, a "Rotogravure Press" is defined as "an unwind ro feed section, which may include more than one unwind or feed station (such as on a laminator), a series of individual work staitons, one or more of which is a rotogravure print station, any dryers associated with the work stations, and a rewind, stack, or collection section. Inboard and outboard work stations, including those employing any other technology, such as flexography, are included if tehy are capable of printing or coating on the same substrate". Applying this definition to the B-308 DPC coating machine, the entire coating machine would meet the definition of a "rotogravure press".

**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 Combustors NESHAP**

Kodak's Multiple Hearth Incinerator (MHI) at Bldg 95 of Kodak Park is subject to the requirements of the MACT for Hazardous Waste Combustors.

**40 CFR 63.1203**

In the previous permit, Kodak's MHI was compliant with the interim emission standards for existing sources, listed at Subpart EEE.1203(a). Since the submittal of the Title V Renewal application on 8/21/07, the interim emissions standards of §63.1203 were superseded by the replacement standards of §63.1219. On 10/31/08, Kodak submitted a report of the Comprehensive Performance Test (conducted August 5-7, 2008) as well as a Notification of Compliance (NOC), documenting that the MHI was in compliance with the emissions standards of §63.1219. Therefore, the interim standards of §63.1203 have been removed from the permit (Renewal 1). The emission standards for the MHI are now cited in the permit under a §63.1219(a).

**40 CFR 63.1206 Operating Requirements**

**40 CFR 63.1206(c)**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

There are numerous monitoring conditions listed under this citation which address requirements for operating the MHI. These include: requirements for the Startup, shutdown and malfunction plan (SSMP) (63.1206(c)(2)); requirements for investigating and reporting excessive exceedances of other parametric monitoring limits (63.1206(c)(2)(v)(A)(3) and 63.1206(c)(3)(vi)); three conditions addressing requirements for operating & testing a system which automatically cuts off the hazardous waste feed to the MHI (AWFCO)(63.1206(c)(3)); four conditions addressing the operation and reporting of emergency safety vents (ESV)63.1206(c)(4); two monitoring conditions for the control of combustion system leaks by continuously monitoring draft pressure of the MHI and maintaining it below ambient pressure (63.1206(c)(5)); two monitoring conditions specifying training requirements for MHI operators (63.1206(c)(6); and a condition to maintain operation according to a O&M plan consistent with good operating practices and as demonstrated by the CPT (63.1206(c)(7). These monitoring requirements are directly specified by the rule itself.

In accordance with 62.1206(c)(1), language has been included in affected operating conditions indicating that the parameter limits do not apply (1) during performance tests conducted in accordance with approved test plans, or (2) during periods of startup, shutdown or malfunction if the owner takes the corrective measures prescribed in the startup, shutdown and malfunction plan, and (3) when hazardous waste is not in the combustion chamber.

**40 CFR 63.1209 Monitoring Requirements**

**40CFR 63.1209(a)**

A condition has been included at 1209(a)(2) to address requirements for operating and calibrating the CO and oxygen CEMS in accordance with Performance Specification 4Bin Appendix B of Part 60. No condition has been included for 1209(a)(1) because the requirement to continuously monitor CO and oxygen using a CEMs is already included in the CO monitoring condition cited at 1203.

**40 CFR 63.1209(b)**

A condition has been included at 1209(b) which states the requirements for operating and calibrating the non-CEMS Continuous Monitoring Systems (CMS), including frequency of calibration of thermocouples.

**40 CFR 63.1209(c)(2)**

A condition has been included which specifies the requirements for a Feedstream Analysis Plan.

**40 CFR 63.1209(g)(2)**

The Department has used its discretion in accordance with 40 CFR 63.1209(g)(2) to specify additional or alternative monitoring requirements. Other monitoring requirements are included under the later paragraphs of this section. The eight conditions included here are based on the Comprehensive Performance Test and are intended to optimize the performance of the control equipment and minimize emissions. These conditions include: 1) maximum temperature at MHI hearths #3 and #4; 2) minimum water flowrate to the quench; 3) maximum outlet temperature from the quench; 4) minimum secondary power to the Wet Electrostatic Precipitator (WESP); 5) maximum cadmium feedrate; 6) maximum Secondary Combustion Chamber (SCC) temperature; 7) maximum rabble arm speed; and 8) minimum secondary specific power to the WESP.

The condition for minimum secondary power to the WESP is based on EPA's Sept 22, 2003 approval of an alternative monitoring request which specified the use of specific power (VA/ 1000 acfm) in addition to secondary power (KVA) to monitor the operation of the WESP. Specifically, EPA stated in the 9/22/03 approval that Kodak had demonstrated that specific power is adequate to assure compliance under the miniburn conditions demonstrated. However, EPA would require monitoring of minimum secondary power as well to ensure compliance when stack gas is lower than that demonstrated during testing. Kodak must always use the automated control to maximize voltage to the WESP.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**40 CFR 63.1209 (j) Destruction & Removal Efficiency (DRE)**

See permit conditions cited under 1209(m)(1)(i)(C) to monitor the maximum stack gas air flow rate through the system. See permit conditions cited under 1209(k)(2) for monitoring of minimum combustion chamber temperatures and the condition cited under paragraph (k)(4) for monitoring total sludge feed rate.

**40 CFR 63.1209 (k) dioxins and furans**

**40 CFR 63.1209(k)(2)**

Under this citation, two monitoring conditions require monitoring of minimum combustion chamber temperature in each of the combustion chambers: 1) the #3 and #4 Hearths, and 2) the Secondary Combustion Chamber (SCC). These monitoring locations best represent the bulk gas temperature in the combustion zones. These conditions also satisfy the requirement for monitoring minimum temperature under paragraph 1209(j)(1) for DRE.

**40 CFR 63.1209(k)(3)**

See condition for monitoring maximum stack gas air flow rate cited under 1209(m)(1)(i)(C).

**40 CFR 63.1209(k)(4)**

One condition is included to require monitoring the maximum hazardous waste feedrate (sludge, grit & debris) to the MHI. This condition also satisfies paragraph (j)(3) of this section.

**40 CFR 63.1209(l) Mercury**

**40 CFR 63.1209(l)(1)**

A condition is included to monitor the maximum feed rate of mercury in the waste stream.

**40 CFR 63.1209(l)(2)**

A condition is included to monitor the minimum feed water pressure to the Condenser. This satisfies the requirement at 1209(l)(2), as well as (o)(3)(iii), for combustors equipped with wet scrubbers. See also the monitoring conditions for minimum water flow rate to the venturi scrubber cited at 1209(m)(1)(i)(C).

**40 CFR 63.1209(m) Particulates**

**40 CFR 63.1209(m)(1)**

There are five conditions included to specify operating parameter limits for the control devices aimed at removing particulate emissions from the gas stream. The venturi scrubber is considered a high energy scrubber subject to the requirement to monitor a minimum pressure drop across the scrubber (1209(m)(1)(i)(A)). In addition to this citation, the condition for minimum pressure drop across the venturi satisfies requirements of paragraphs 1209(l)(2), (n)(3), and (o)(3)(i) for control of mercury, metals and HCl, respectively. Additionally, the minimum venturi blowdown and minimum liquid level in the recycle tank are required per 1209(m)(1)(i)(B)(1) as well as under paragraph 1209(n)(3) for metals. A condition to monitor the minimum water flow rate to the venturi scrubber is cited at 1209(m)(1)(i)(C) which also satisfies requirements cited under paragraphs 1209(l)(2), (o)(2), and (n)(5). The requirement to monitor the maximum stack gas air flow rate is specified in several other paragraphs of the rule: 1209(k)(3), (j)(2), (n)(5), and (o)(2); but is included in the permit under the 1209(m)(1)(i)(C) citation.

**40 CFR 63.1209(m)(3)**

A condition is included to monitor the maximum ash feed rate on a 12 hour average basis as specified in the rule. The limit was established based on the test run averages, extrapolated by 30% as allowed by EPA's 9/22/03 alternative monitoring petition approval: average ash feed 1200 lb/hr x 12 hr x 1.3 (30% extrapolation) = 18,720 lb/12 hr limit.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**40 CFR 63.1209(n) Semi-Volatile and Low-Volatile Metals**

Conditions limiting the feedrate of semi-volatile and low-volatile metals on a 12-hour average basis are included under 1209(n)(2). These limits are based on data collected during the comprehensive performance testing. The low-volatile metal limit is based on a 30% extrapolation of the test data as allowed under paragraph (n)(2)(vii). See conditions cited under 1209(m) for control of particulate emissions which also satisfy the requirements of 1209(n)(3) and (n)(5).

**40 CFR 63.1209(o) Hydrogen Chloride and Chlorine gas**

**40 CFR 63.1209(o)(1)**

A condition is included to limit the maximum total feed rate of chlorine on a 12-hour average basis. This condition satisfies the requirement to limit the total chlorine feed rate for minimizing metal emissions under 1209(n)(4) as well.

**40 CFR 63.1209(o)(2)**

See conditions cited under 1209(m)(1)(i)(C) for control of particulate emissions which also satisfy the requirements of 1209(o)(2).

**40 CFR 63.1209(o)(3)(ii)**

A monitoring condition is included for monitoring pressure drop across the Condenser/Absorber as required by paragraph 1209(o)(3)(ii) for low-energy set scrubbers. This monitoring condition does not include an Automatic Waste Feed Cutoff (AWFCO) based on USEPA's September 22, 2003 approval of an alternative monitoring petition which specifies an alarm only, followed by necessary corrective action. The lower pressure drop limits at stack gas flowrates less than 8863 acfm are based on a December 29, 2005 alternative monitoring petition approval. Additionally, monitoring requirements for pH and solids content, specified at 63.1209(o)(3)(iv) and 63.1209(m)(1)(i)(B), were waived by USEPA's August 27, 2001 approval of an alternative monitoring petition. This condition also satisfies requirements for monitoring the Condenser/Absorber under paragraphs (m)(1)(i)(B)(1) and (l)(2) for particulate and mercury control.

**40 CFR 63.1209(o)(3)(iii)**

See monitoring condition cited at 1209(l)(2).

**40 CFR 63.1209(o)(3)(iv)**

A condition to monitor the minimum pH of the venturi blowdown is included under this citation. The pH limit of 5.4 is based on Kodak's February 13, 2009 alternative monitoring petition which was approved by EPA.

**40 CFR 63.1209(o)(3)(v)**

A condition to monitor the minimum Condenser/Absorber feed water flow rate is included which satisfies the requirement at paragraph (l)(2) of this section as well as (o)(3)(v).

**40 CFR 63.1211**

Condition have been included at the facility level for 63.1211(a) and at the emission unit level (EU U-00008) for 63.1211(b) reporting requirements. These conditions detail the requirements to submit a Summary and SSMP Report on a semiannual basis.

**40 CFR 63.1219(a)**

A permit condition has been included under this citation to state the requirement for Kodak to maintain a 99.99% destruction and removal efficiency in the MHI in order to meet the seven emission standards for: Carbon Monoxide, Low-Volatile Metals, HCl and chlorine, Semi-Volatile Metals, Dioxins and Furans, Particulate, and Mercury. For each standard a compliance test is required once during the term of the



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

permit. Operating limits established during testing are specified under separate permit conditions in this permit.

**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-EEEE Organic Liquid Distribution NESHAP**

**40 CFR 63.2342(b)**

This condition describes the applicable limits and work practice standards for the affected sources in U-00021.

**40 CFR 63.2343**

This condition establishes the notification, recordkeeping, and reporting requirements for organic liquid distribution emission sources in EU U-00009 and U-00021 that are subject to 40 CFR Part 63 Subpart EEEE but do not require control under the subpart.

**40 CFR 63.2346(a)**

Permit conditions including control device monitoring parameters have been included for EU U-00021 (Bldg 142 Scrubber System) based on OLD MACT compliance demonstration in September 2007. A specific monitoring condition at this citation specifying fluid flow rate requirements satisfies the requirements in 63.2346, 63.2366 and 63.2374. In addition to the OLD MACT, these operating requirements are included in the permit to demonstrate compliance with equivalent or less stringent requirements of MON MACT, Part 212 VOC RACT and Part 212 BACT.

**40 CFR 63.2346( c)**

This condition specifies monitoring requirements for each U-00021 pump, valve, and sampling connection subject to 40 CFR Part 63 Subpart EEEE that operates in organic liquids service for at least 300 hours per year.

**40 CFR 63.2350**

This condition states the general requirements to operate and maintain the U-00021 equipment subject to the rule and to develop a start up, shut down, and malfunction plan (SSMP).

**40 CFR 63.2378**

This condition spells out the details of demonstrating compliance with the rule.

**40 CFR 63.2386**

This facility level condition includes the periodic reporting requirements for sources subject to the OLD MACT.

**40 CFR 63.2390**

These conditions specify the necessary records for demonstrating compliance under OLD MACT.

**40 CFR 63.2394**

These conditions specify the requirements for proper record keeping under the rule.

**40 CFR 63. 2398**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

This facility level condition references the General Provisions in 40 CFR 63 Subpart A which are applicable to the OLD affected sources in U-00009 and U-00021.

**40 CFR 63-FFFF Miscellaneous Organic Chemical Manufacturing NESHAP**

Kodak is subject to the requirements of the MON MACT for affected equipment identified as Miscellaneous organic Chemical manufacturing Process Units (MCPUs). MON MACT requirements are included in the Title V permit under Emission Units: U-00009, U-00016, U-00021, U-00023, U-00025, U-00048, U-00053, U-00056, U-00060, and U-00089. The rule applicability and monitoring requirements were included in the permit based on Kodak's Notification of Compliance (NOC) Status document, dated October 7, 2008; Compliance Test reports; correspondence with EPA; and Kodak's own MON applicability assessment. Some emission units which were initially identified as being applicable to the rule have been eliminated from the permit because of source shut downs and/or consolidation with other applicable emission units (ex. U-00002, U-00005, U-00077).

The monitoring requirements included in the permit are specified in Subpart FFFF, or in other sections of Part 63 as referenced in Subpart FFFF, except for monitoring parameters specifically requested by Kodak according to alternative monitoring provisions allowed under the rule and/or facility-specific parameters established through testing. The development of Kodak-specific monitoring conditions are explained in Kodak's Precompliance Reports, dated July 26, 2005 and November 8, 2007 and in EPA's response, dated February 6, 2008:

- Monitoring the supply temperature of the Bldg 322 condenser coolant, as an alternative to the condenser exit temperature required by 63.990(c)(2);

- Monitor the methanol absorber liquid to gas ratio, and fresh and recirculated methanol flow rates, as an alternative to an organic continuous monitoring device required by 63.990(c)(1).

- In accordance with 40 CFR 63.2450(k)(3), daily monitoring of caustic strength of the scrubber effluent as an alternative to continuous pH monitoring for caustic scrubbers used to control only batch process vents is allowed. Kodak will conduct monitoring and recordkeeping to ensure that the strength of caustic solution used in their prescrubbers in EU U-00053 and EU U-00060 meet or exceed the ionic capacity required to provide effective pretreatment. The conditions specify process monitoring and documentation on a per batch basis.

**40 CFR 63.2520**

A semiannual compliance report is due each August 31st and February 28th. A monitoring condition under this citation details the content of this report.

**40 CFR 63.2535(1)**

A facility-level condition has been added to the permit as a minor modification of the permit to create a process unit group ("PUG") according to the provisions of this citation. The PUG is developed in order to allow for the manufacture of a pharmaceutical pre-cursor on non-dedicated equipment currently subject to the Miscellaneous Organic Chemical NESHAP (MON) rule without triggering additional requirements under the Pharmaceutical MACT so long as the predominant product from this process group is MON applicable.

**40 CFR 63.2540**

Sources subject to Subpart FFFF are also subject to portions of the General Provisions in Subpart A of Part 63 according to the applicability identified in Table 12 of Subpart FFFF.

**40 CFR 63-JJJJ Paper and Other Web Coating NESHAP**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

Sources included in EU U-00011, U-00024 and U-00047 are subject to this MACT rule. Facility-level conditions for Subpart JJJJ specify the requirements for the applicable emission units.

**40 CFR 63.3370(c)**

This facility level monitoring condition specifies the site-wide organic HAP limit specified under 63.3320(b)(2) and (3) of the Subpart.

**40 CFR 63.3400(c)(2)**

A semiannual compliance report is due each July 30th and January 31st. A monitoring condition under this citation details the content of this report.

**40 CFR 63.3410(a)**

This condition specifies the record keeping requirements associated with the site-wide organic HAP limit. Compliance with these limits is demonstrated using formulation data for as-applied coatings. No control devices or CEMS are used to comply with the emission limit.

**40 CFR 63- ZZZZ Reciprocating Internal Combustion Engines NESHAP**

Kodak is a major source of HAPs subject to the emission limitations and operating limits for hazardous air pollutants (HAPs) emitted from stationary reciprocating internal combustion engines (RICE). Conditions for the RICE rule, effective May 3, 2010, were included in the Renewal ("Ren 1") permit under a new Emission Unit, EU F-AC003, to represent applicable Kodak engines located throughout Eastman Business Park. At the time of "Ren 1" permit, six engines are subject to the rule and are grouped into three Processes according to their applicability category under the rule. Future compliance dates of May 3, 2013 and October 19, 2013 are specified under the rule depending on the type of engine, compression ignition (CI) or spark ignition (SI).

**40 CFR 63.6602**

Monitoring conditions under this citation include the applicable maintenance requirements (i.e. inspection and oil change frequency) specified in Table 2c of the rule.

**40 CFR 63.6625(e)**

Conditions under this citation state the record keeping requirements associated with good operation and maintenance of the applicable engine and after-treatment control device (if any).

**40 CFR 63.6625(f)**

Conditions under this citation state the requirement to have a non-resettable hour meter on each applicable engine.

**40 CFR 63.6625(h)**

Conditions under this citation specify the restriction of the start-up period when other operating and maintenance requirements do not apply. Operators are required to minimize idle time during start up of the engine and limit the start up period to 30 minutes.

**40 CFR 63.6640(f)**

Conditions under this citation include the requirements for demonstrating compliance with the operating limits for emergency stationary engines. In order to be considered an emergency engine, limitations on the hours of operation apply. Paragraph (f)(1) describes the limitations for emergency stationary RICE with ratings less than or equal to 500 bHP (Processes CIL and SIL). Paragraph (f)(2) describes the limitations for those greater than 500 bHP (Process EHG).

**40 CFR 63.6655(f)**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

Conditions under this citation state the record keeping requirements that apply to emergency engines less than 500 bHP. Using the hour meter required under 63.6625(f), the operators must document the hours of operation of each engine.

**40 CFR 63- BBBBB Semiconductor Manufacturing NESHAP**

**40 CFR 63 -BBBBB.7184(b)**

Specifies limits and compliance monitoring for uncontrolled process vent streams in EU U-00020emitting organic HAPs.

**40 CFR 63 -BBBBB.7184(c)**

Specifies limits and compliance monitoring for uncontrolled process vent streams in EU U-00020emitting inorganic HAPs.

**40 CFR 63 -BBBBB.7184(f)**

Specifies limits and compliance monitoring for uncontrolled process vent streams in EU U-00020emitting a combination of inorganic and organic HAPs, known as "combined HAP" streams. Because Kodak's uncontrolled combined vent streams are below the standard, compliance standard will be demonstrated by engineering assessment just as it is done for vent streams subject to the separate inorganic and organic standards. 63.7187(b) includes provisions which allow for this type of compliance demonstration (using data review and emissions calculations). Perhaps by oversight, this section did not get updated when EPA added the combined standard to the rule. Kodak cited 63.7187(b) in their engineering reassessment for the combined standard which was submitted to EPA on Nov 18, 2008.

**40 CFR 63 -BBBBB.7190(a)**

Specifies requirements for frequency and content of periodic compliance reports for subject processes in EU U-00020.

**40 CFR 63 -BBBBB.7191(a)**

Specifies record keeping requirements for processes in EU U-00020 subject to Subpart BBBBB.

**40 CFR 63 -BBBBB.7192**

Specifies the format and duration of files to be maintained for Subpart BBBBB compliance.

**40 CFR 63 -BBBBB.7193**

Specifies which of the 40 CFR 63 Subpart A General Provisions apply for Subpart BBBBB sources.

**40 CFR 63-GGGGG Site Remediation NESHAP**

A non-applicability determination has been included in the permit to document that Kodak is not subject to 40 CFR 63 Subpart GGGGG since all site remediation activities are performed under a Resource Conservation and Recovery Act (RCRA) corrective action that is required under the site's RCRA permit. Kodak Operations at Eastman Business Park is therefore exempt per 63.7881(b)(3).

**40 CFR 64 Compliance Assurance Monitoring (CAM)**

For those emission units which CAM applies, the Renewal permit ("Ren 1") includes new CAM conditions or amended existing periodic monitoring conditions at the emission unit level for the pollutant/standard/pollutant-specific emission unit combination(s) that trigger CAM. These conditions are intended to cover the necessary elements of a CAM submittal as described in 64.4.

**40 CFR 64.4**

Justification of the proposed CAM, required under paragraph 64.4(b), and past test data and associated documentation used to support the proposed monitoring, required under 64.4(c), were provided as part of



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

Kodak's Renewal application and are included below under the appropriate Emission Unit headings. Where CAM applicability may not be self-evident, a brief applicability analyses and conclusions for units, pollutants and standard combinations for which Kodak has concluded that CAM does not apply is also included below.

**U-00008**

**EP 09503 – Multiple Hearth Incinerator**

**212.4(b) – Particulate standard**

The Multiple Hearth Incinerator (MHI) is subject to requirements contained in the Hazardous Waste Combustor MACT 40 CFR 63 Subpart EEE. As part of these requirements a Comprehensive Performance Test (CPT) was conducted to demonstrate the ability of the incinerator to meet the HWC emission limits. Subsequent to the CPT, a Notice of Compliance (NOC) was submitted and approved by the NYSDEC on February 17, 2006. The NOC included the monitoring requirements necessary to comply with the particulate limits. CAM for 6 NYCRR Part 212.4(b) will be satisfied by monitoring the following parameters as identified in the MHI NOC:

1. Water flow rate to the condenser (Control Device 09507);
2. Feed of wastewater sludge, grit, and debris to the Multiple Hearth Incinerator (Emission Source 095AF);
3. Venturi scrubber (Control Device 09509) blowdown rate;
4. Water flow rate to the quench chamber (Control Device 09506);
5. Stack gas air flow rate through the Multiple Hearth Incinerator (Emission Source 095AF);
6. Secondary specific power supplied to the wet electrostatic precipitator (WESP) (Control Device 09511);
7. Water flow rates to the venturi scrubber approach and throat (Control Device 09509);
8. Pressure drop across the venturi scrubber (Control Device 09509);
9. Condenser (Control Device 09507) water pressure;
10. WESP KVA (Control Device 09511); and
11. Ash feed rate to the Multiple Hearth Incinerator (Emission Source 095AF)

The indicator ranges for the parameters will be consistent with the limits provided in the NOC. Kodak must comply with the Emergency Safety Vent provisions in 40 CFR 63.1206(c)(4).

Under 64.4(b)(4), monitoring conducted for “standards exempt from this part” is presumptively acceptable to the extent that the monitoring is “applicable to the performance of the control device. . .for the pollutant-specific emissions unit”. The proposed monitoring approach relies on monitoring performed to meet 40 CFR 63 Subpart EEE (a standard exempt from CAM) and is relevant to assessing the ability of the control devices to control particulate emissions from the multiple hearth. As such, the proposed monitoring is presumptively acceptable and satisfies CAM.

**U-00008 (previously U-00017)**

**EP R1601 and R1602 - Wet scrubbers**

**212.10(c)(4)(iii) VOC RACT**

The wet scrubber system was designed to control emissions from the trickling filters, sludge dewatering ("belt press room"), and sludge holding tanks. It is used infrequently and limited to operation during periods of high organic loadings to the KLWPP wastewater treatment plant. The primary function of the wet scrubber system is odor control, however a nominal level of VOC control (generally <5%) is realized for the exhausts from the trickling filters, belt press room, and holding tanks. This control efficiency has historically been relied in the emissions calculation associated with the VOC RACT cap associated with the trickling filters. To optimize the VOC control efficiency a minimum 10 gallon per minute scrubber water blowdown rate is used to ensure the quality of the water in the scrubber system. Process modeling (see 4/18/95 letter from Donna Hendricks, P.E., Kodak to Thomas Marriott, P.E., NYSDEC Region 8) has demonstrated that the control requirements can be met with this blowdown rate.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**U-00008 (previously U-00017)**

**EP 09508 HEPA Filter on Central Vacuum**

**212.4(c) Particulate**

The central vacuum system is used infrequently for cleaning solids (ex. fugitive ash) within Bldg 95. Differential pressure readings are used to continuously monitor the pressure drop across the HEPA filter to ensure particulate emission standards are met and are appropriate to satisfy the CAM monitoring criteria. The indicator range of 0.1 to 5.0 inches of water is based on manufacturer's recommendation in this type of application. A pressure drop below this indicator range may indicate the presence of a tear in the HEPA filter; whereas, a pressure drop above this range is indicative that the HEPA filter may need to be changed.

**U-00009**

**EP 322B1 – Methanol & Water Scrubber**

**212.10(c)(4)(i) VOC RACT**

Parametric monitoring is used to demonstrate compliance with 212.10(c)(4)(i) VOC RACT. The parameters used in this demonstration resulted from emissions testing performed November 2006 in compliance with 212.10(c)(4)(i) VOC RACT. The test report was submitted to NYSDEC on 1/29/07. This test report demonstrated that the lowest control efficiency achieved for an individual VOC constituent was 94% (for heptane). On the whole, VOC control efficiencies achieved were significantly higher than is necessary to meet the Part 212 VOC RACT requirement of 81% ORE. CAM for 6 NYCRR 212.10(c)(4)(i) will be satisfied by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Flow rate of recirculated methanol to the methanol scrubber (Control Device 32214);
2. Flow rate of fresh methanol to the methanol scrubber (Control Device 32214);
3. Flow rate of water to the water scrubber (Control Device 32213);
4. Liquid to vapor ratio for the methanol scrubber (Control Device 32214);
5. Liquid to vapor ratio for the water scrubber (Control Device 32213); and
6. Refrigerated vent condenser temperature (Control Device 32207).

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

**U-00011**

**Process E06**

**EP53L6 carbon adsorber**

**212.10(c)(4)(i) VOC RACT**

General process emission sources which are ducted to Emission Point 053L6 in U-00011 are subject to a Part 212 VOC ORE of 81%. With the exception of one emission source (described below), emissions from the affected emission sources are directed to the B-53 Carbon Adsorber System (CAS).

6 NYCRR Part 212.11(b)(3) requires that "the volatile organic compound outlet concentrations must be monitored from fixed-bed carbon adsorption units". This is satisfied by a permit condition which requires monitoring the concentration of Total Hydrocarbons via a Total Hydrocarbon Analyzer (which measures the total of VOC's and non-VOC organics).

Emission Source 053CE ("B53 4TH FLR SUBSTRATE SOL FILT & CONC") represents the only emission source which is directed to Emission Point 053L6, however, is not controlled via the B-53 CAS. In order to demonstrate compliance with the VOC RACT requirements of 6 NYCRR 212.10(c)(4)(i), Kodak conducted a performance test during the time period of 6/13/03 – 6/20/03, as required by the initial Title V permit. As part of this evaluation, the B-53 Carbon Adsorber System was determined to provide 99.6% removal of VOC, and the overall VOC removal efficiency (which considered the capture efficiency of the processes, as well as the uncontrolled Emission Source 053CE) was determined to be 92.3%.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

Emission sources are routed to the B-53 CAS via the “CAS Isolation Box”. The Isolation Box is equipped with an exhaust stack as well as an air intake duct. (Emission Point 053K6 is construed to be an aggregate of the exhaust stack and air intake duct of the Isolation Box). This Renewal permit includes proposed revisions to Permit Condition 2-76 intended to address the CAM requirements with respect to the potential bypass of the emission control.

**U-00011**

**CAM Applicability Analysis: Process E08      EP53L6 carbon adsorber    228.3(c) VOC RACT**

The casting and coating operations in U-00011 are subject to a Part 228 VOC ORE of 85%. This is satisfied through reliance on solvent recovery equipment that is inherent to the process and control of the “slipstreams” from the casting and coating operations by a carbon adsorber system. Under condition 2-58, the PRIMA Analyzer monitors various locations of the casting and coating operations including the outlet of the carbon adsorber, such that the overall system is monitored continuously for Part 228 compliance with the ORE standard. The PRIMA is calibrated for Dichloromethane and VOC emission factors determined from past emission testing are applied to correlate the readings to VOC. Those VOC emission numbers directly become part of the required 24-hour average ORE calculations. Thus, the monitoring required by condition 2-58 is a continuous compliance determination method as defined in 64.1. As such, the casting and coating operations under process E08 are not subject to CAM with respect to the Part 228 VOC 85% ORE in accordance with 40 CFR 64.2(b)(vi).

**U-00019**

**EP 14302 – Wet Scrubber**

**212.10(c)(3) NO<sub>x</sub> RACT**

Parametric monitoring is used to demonstrate compliance with 212.10(c)(3) NO<sub>x</sub> RACT. The parameters used in this demonstration were based on past operating history and in-house sampling performed May 12, 2003 confirmed the ability of the scrubbers to meet required control efficiencies. CAM for 6 NYCRR 212.10(c)(3) will be satisfied by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Flow rate of water (Control Device 14303) and
2. Pressure drop (Control Device 14303).

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

**U-00021**

**EP 12007 – Methanol & Water Scrubber**

**212.10(c)(4)(i) VOC RACT**

Parametric monitoring is used to demonstrate compliance with 212.10(c)(4)(i) VOC RACT. The parameters used in this demonstration were based on past operating history and in-house sampling performed May – October 2005 confirmed the ability of the scrubbers to meet required control efficiencies. CAM for 6 NYCRR 212.10(c)(4)(i) will be satisfied by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Flow rate of recirculated methanol to the methanol scrubber (Control Device 12001);
2. Flow rate of fresh methanol to the methanol scrubber (Control Device 12001); and
3. Flow rate of water to the water scrubber (Control Device 12006).

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

**U-00021**

**EP 14201 – Methanol & Water Scrubber**

**212.10(c)(4)(i) VOC RACT**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

Parametric monitoring is used to demonstrate compliance with 212.10(c)(4)(i) VOC RACT. The parameters used in this demonstration were based on past operating history and in-house sampling performed May – October 2005 confirmed the ability of the scrubbers to meet required control efficiencies. CAM for 6 NYCRR 212.10(c)(4)(i) will be satisfied by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Flow rate of recirculated methanol to the methanol scrubber (Control Device 14201);
2. Flow rate of fresh methanol to the methanol scrubber (Control Device 14201); and
3. Flow rate of water to the water scrubber (Control Device 14202).

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

**U-00053**

**CAM Applicability Analysis:**

**EP 325X3 (Caustic/Water Scrubbers)**

**212.4(c) Particulate standard**

Emission point 325X3 is an aggregate of 9 individual caustic/water scrubbers that is subject to the particulate standard in 6NYCRR 212.4(c). The combined PTE for particulate on the 325X3 authorized emissions table is 120 tpy. However, the pollutant-specific emissions unit for purposes of determining CAM applicability is the group of emission sources emitting to a single scrubber, because compliance with the particulate standard would be assessed at the actual emission point level not for the aggregate as a whole. Given that the pre-control PTE of particulate for each of these pollutant-specific emission units is less than 100 tpy, CAM does not apply.

**U-00060**

**EP 304B0 (Glycol Condenser)**

**40 CFR 52.21 – VOC limit**

Outlet glycol temperature is continuously monitored to ensure required control efficiencies are maintained. An alarm system is used to alert operations if elevated glycol temperatures reading occur. If the glycol temperature rises to within 5°C of the compliance temperature, a warning light comes on the control panel. If the temperature rises to within 1°C of the compliance setpoint, an alarm sounds and the process goes into automatic shutdown mode.

The compliance temperature setpoint was selected based on previous emission sampling on the outlet of the condenser. At this setpoint, outlet emissions are sufficiently reduced to comply with a 40CFR 52.21 VOC emissions limit of 39.9 tpy.

**U-00063**

**EP 101A2 (Fabric Filter and Wet Scrubber)**

**212.4(c) Particulate standard**

Parametric monitoring and operating and maintenance procedures are used to demonstrate compliance with 212.4(c). The parameters and procedures used in this demonstration were based on past operating history and in-house sampling performed during 2001 confirmed the ability of the baghouse and scrubber to meet required control efficiencies. CAM for 6 NYCRR 212.10(c) will be satisfied by following the procedures listed below and by monitoring the following parameters as identified in the existing Title V permit conditions:

1. The baghouse (ES 10103) and scrubber (ES 10115) shall be operated and maintained according to manufacturer's recommendations;
2. Bags will be inspected approximately 4 times per year when the roaster is shut down, and replaced as necessary;



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

3. The permittee shall operate an in-line opacity meter;
4. The opacity meter shall be inspected as necessary for normal performance and manufacturer's recommended maintenance performed;
5. The permittee will conduct compliance verifications as specified in the permit and at the monitoring frequency specified in the permit; and
6. The permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred.

**U-00063**

**EP 101A2 (scrubber)**

**40 CFR 52.21 - SO2 Limit**

Parametric monitoring and operating and maintenance procedures are used to demonstrate compliance with 40 CFR 52.21. The parameters and procedures used in this demonstration were based on past operating history and in-house sampling performed during 2002 confirmed the ability of the scrubber to meet required control efficiencies.

CAM for 40 CFR 52.21 will be satisfied by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Visually inspect the scrubber demister pad on an annual basis to ensure proper operation;
2. Maintain the hourly average scrubber venturi pressure drop at or above 3.5" H<sub>2</sub>O;
3. Maintain the hourly average scrubber tray recirculation pH at or above 6; and
4. Maintain the hourly average scrubber quench temperature at or below 175 °F.

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

**U-00063**

**EP 101A2 (Direct Flame Afterburner)**

**212.10(c)(4)(i) VOC RACT**

Parametric monitoring is used to demonstrate compliance with 212.10(c)(4)(i) VOC RACT. The parameters used in this demonstration were based on past operating history and in-house sampling performed 2002 confirmed the ability of the afterburner to meet required control efficiencies. CAM for 6 NYCRR 212.10(c)(4)(i) will be satisfied by monitoring the following parameters as identified in the existing Title V permit condition:

Maintain afterburner outlet gas temperature at an hourly average temperature above 1650 deg F.

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

**U-00063**



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**EP 101A3 (Fabric Filter)**

**212.4(c) Particulate standard**

Parametric monitoring and operating and maintenance procedures are used to demonstrate compliance with 212.4(c). The parameters and procedures used in this demonstration were based on past operating history and in-house sampling performed during 2002 confirmed the ability of the baghouse to meet required control efficiencies. CAM for 6 NYCRR 212.10(c) will be satisfied by following the procedures listed below and by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Operate and maintain the baghouse (Control Device 10104) according to manufacturer's specifications;
2. Monitor opacity continuously and maintain it below 20%; and
3. Inspected bags every six months and replaced as necessary.

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

**U-00086**

**EP 319C1 (Regenerative Thermal Oxidizer)**

**Subpart KK MACT Standard**

Per the requirements of 40CRF Part 63, Subpart KK (NESHAP for Printing and Publishing) Kodak prepared a compliance test plan for the B319 printing machine. Test objectives were to demonstrate total enclosure capture efficiency, RTO control efficiency, and RTO NOx & CO emission factors. The plan was approved by NYSDEC, and Subpart KK compliance was demonstrated during the 11/28/2006 compliance test. A full test report of the compliance testing was submitted to NYSDEC on 01/15/2007. Based on the test results, monitoring conditions were incorporated in the Air State Facility permit for the B319 printing operations.

Under 64.4(b)(4), monitoring conducted for “standards exempt from this part” is presumptively acceptable to the extent that the monitoring is “applicable to the performance of the control device for the pollutant-specific emissions unit”. The proposed CAM approach relies on monitoring performed to meet 40 CFR 63 Subpart KK (a standard exempt from CAM) and is relevant to assessing the ability of the control devices to control VOC emissions. As such, the proposed monitoring is presumptively acceptable and satisfies CAM.

**U-00087**

**EP 349E5, EP349E6 and EP349H4 (High Efficiency Particulate Filters) 212.4(c) Particulate standard**

Parametric monitoring and operating and maintenance procedures are used to demonstrate compliance with 212.4(c). The parameters and procedures used in this demonstration were based on past operating history, engineering calculations, and manufacturers performance guarantees confirming the ability of the baghouse to meet required control efficiencies. CAM for 6 NYCRR 212.4(c) will be satisfied by following the procedures listed below and by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Continuous monitoring with a leak detector;
2. Perform a visual inspection if an alarm is received; and
3. Make necessary repairs if a leak is detected by visual inspection.

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**

**U-00087**

**EP 349D2 (Wet Scrubber)**

**212.4(c) Particulate standard**

Parametric monitoring is used to demonstrate compliance with 212.4(c). The parameter used in this demonstration was based on past operating history, engineering calculations, and manufacturers performance guarantees confirming the ability of the scrubber to meet required control efficiencies. CAM for 6 NYCRR 212.4(c) will be satisfied by following the procedures listed below and by monitoring the following parameters as identified in the existing Title V permit condition:

Maintain flow rate of water to the scrubber (Control Device 34976) at or above 145 gpm.

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

**U-00087**

**EP 349H9 (Wet Dynamic Separator)**

**212.4(c) Particulate standard**

Parametric monitoring is used to demonstrate compliance with 212.4(c). The parameter used in this demonstration was based on past operating history, engineering calculations, and manufacturers performance guarantees confirming the ability of the scrubber to meet required control efficiencies. CAM for 6 NYCRR 212.4(c) will be satisfied by following the procedures listed below and by monitoring the following parameters as identified in the existing Title V permit condition:

- 1) Maintain pressure drop across the dynamic separator (Control Device 34993) between 4 and 8 "wc. If the pressure falls outside this stated range, dry material feeding & handling operations (ES 349EL) shall cease immediately and maintenance shall be performed.
- 2) Annual inspection of the dynamic separator and standard preventative maintenance shall be performed as appropriate.
- 3) Pressure monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures.

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

**40 CFR 64.7**

This condition states the requirements for operating within the CAM requirements, including proper maintenance, data collection, and response and documentation of excursions.

**40 CFR 64.8**

This condition states that if a facility has repeated problems complying with a CAM requirement, the Administrator may require the owner or operator to develop and implement a Quality Improvement Plan (QIP). Details of the QIP requirement are included in the rule at 64.8, but were not incorporated into the Renewal permit because no QIP has been required yet.

**40 CFR 64.9**

This condition states the Reporting and Record Keeping requirements for CAM.



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

**Permit ID: 8-2614-00205/01801**

**Renewal Number: 1**

**08/19/2013**