



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

Permit ID: 8-2614-00205/01827

Renewal Number: 1

Modification Number: 1 05/25/2012

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

Division of Environmental Permits:

Name: ROGER T MCDONOUGH

Address: 6274 EAST AVON LIMA RD

AVON, NY 14414-9519

Phone:5852262466

Division of Air Resources:

Name: BERNETTE SCHILLING

Address: 6274 EAST AVON-LIMA ROAD

AVON, NY 14414

Air Permitting Contact:

Name: EDWARD R SILER

Address: SUEZ-DEGS OF ROCHESTER LLC

3896 DEWEY AVE STE 325

ROCHESTER, NY 14616

Phone:5855886982

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

Modification to incorporate the conditions reviewed and approved by the Department (letter dated 11/21/11 from NYSDEC to SUEZ-DEGs) to comply with the Best Available Retrofit Technology (BART) regulations (6 NYCRR Part 249).

Generally, this BART Plan states SUEZ-DEGs and Kodak's commitment to: 1) retire Boiler 41 by the end of 2013, 2) Retire or repower Boiler 42 by the applicable MACT compliance date, but no later than



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August 16, 2017, and 3) install controls on Boiler 43 to meet the MACT requirements by the NESHAP compliance date. Note that Boiler 44, though not subject to Part 249 requirements, will also need to comply with the NESHAP.

In addition, this modification provides the opportunity to incorporate permit conditions for Compliance Assurance Monitoring (CAM) requirements to replace Condition 57 for Boilers 41 & 44.

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:

The Kodak Park site is a large, integrated manufacturing plant producing photographic films, papers, and synthetic organic chemicals. Suez-DEGS of Rochester, LLC, has contractually agreed to operate the air emissions sources associated with power production at Buildings 31 and 321 of Kodak Park.

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 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



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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 U00015 - BUILDING 31 AND 321 STATIONARY COMBUSTION INSTALLATIONS, INCLUDING PACKAGE AND BUILT UP BOILERS USED FOR THE GENERATION OF PROCESS STEAM AND ELECTRICITY

Emission unit U00015 is associated with the following emission points (EP):
00001, 00003, 00004

Process: K07 is located at Building 031 - NO 6 FUEL OIL COMBUSTION IN PACKAGE BOILERS

Process: K12 is located at Building 321 - NO 6 FUEL OIL COMBUSTION FOR BUILT UP BOILERS
41, 42 AND 43

Process: K13 is located at Building 321 -

Process: K14 is located at Building 321 -

Process: K15 is located at Building 321 -

Emission unit U00035 - UTILITIES SUPPLY SIDE MISCELLANEOUS STORAGE VESSELS

Emission unit U00035 is associated with the following emission points (EP):
03104, 321A0

Process: K16 is located at Building 031 - NO. 2 FUEL OIL STORAGE

Process: K25 is located at also Bldg 321, Building 031 - BOILER FEEDWATER ADDITIVE
STORAGE

Process: PTC is located at 031, Building 321 - SOLVENT METAL CLEANING MACHINES IN
BUILDING 31 AND 321

Emission unit U00051 - COAL AND ASH HANDLING SYSTEMS INCLUDING FUGITIVE
EMISSIONS FROM THE KPS COAL PILE AND EXEMPT ACTIVITIES FROM BUILDING 31

Emission unit U00051 is associated with the following emission points (EP):
32102, 32106, 32107, M9001

Process: K18 is located at Building 321 - COAL ASH STORAGE AND TRANSFER OPERATIONS

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:

This permit, including Kodak's Boiler operations, is one of two Title V Permits for the Kodak facility 8-2614-00205. The facility is major source of NO_x, VOC, Particulate, SO₂ and total HAP emissions. It may also be considered major for some individual HAPs and other criteria pollutants.

Program Applicability

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

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regulatory programs:

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

NOTES:

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



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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.

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
4931	ELEC & OTHER SERVICES COMBINED

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

1-02-002-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - SUBBITUMINOUS COAL Pulverized Coal: Dry Bottom
1-02-002-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - SUBBITUMINOUS COAL Cyclone Furnace
1-02-004-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL

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1-02-005-01	Grade 6 Oil EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL
3-05-101-99	Grades 1 and 2 Oil MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS CONVEYORS
3-16-130-02	Other Not Classified PHOTOGRAPHIC PRODUCT MANUFACTURING STORAGE OPERATIONS
4-01-003-36	GENERAL STORAGE OPERATIONS ORGANIC SOLVENT EVAPORATION COLD SOLVENT CLEANING/STRIPPING Entire Unit

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
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

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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
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- DICHLOROPHENOXYACETI C ACID	>= 10 tpy
000108-31-6	2,5 - FURANDIONE	>= 10 tpy
000053-96-3	2- ACETYLAMINOFLUORENE	>= 10 tpy
000078-59-1	2-CYCLOHEXEN-1- ONE,3,5,5-TRIMETHYL	>= 10 tpy
000109-86-4	2-METHOXYETHANOL	>= 10 tpy
000095-48-7	2-METHYL-PHENOL	>= 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL	>= 10 tpy
000079-10-7	2-PROPENOIC ACID	>= 10 tpy
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER	>= 10 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
0NY502-00-0	40 CFR 60-63 - TOTAL ORGANIC COMPOUNDS (TOC)	>= 250 tpy but < 75,000 tpy
000060-11-7	4- DIMETHYLAMINOAZOBEN ZENE	>= 10 tpy
000075-07-0	ACETALDEHYDE	>= 10 tpy
000060-35-5	ACETAMIDE	>= 10 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER	>= 10 tpy
000079-11-8	ACETIC ACID, CHLORO	>= 10 tpy
000075-05-8	ACETONITRILE	>= 10 tpy
000107-02-8	ACROLEIN	>= 10 tpy
000532-27-4	ALPHA- CHLOROACETOPHENONE	>= 10 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
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
000098-82-8	BENZENE, (1- METHYLETHYL)	>= 10 tpy
000072-55-9	BENZENE, 1,1'- (DICHLOROETHENYLIDEN E)BIS[4-CHLORO-	>= 10 tpy

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000106-46-7	BENZENE, 1,4-DICHLORO-	>= 10 tpy
000584-84-9	BENZENE, 2,4-DIISOCYANATO-1-METHYL-	>= 10 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
000075-25-2	BROMOFORM	>= 10 tpy
007440-43-9	CADMIUM	>= 10 tpy
000133-06-2	CAPTAN	>= 10 tpy
000051-79-6	CARBAMIC ACID, ETHY ESTER	>= 10 tpy
000079-44-7	CARBAMIC CHLORIDE, DIMETHYL	>= 10 tpy
000124-38-9	CARBON DIOXIDE	>= 250 tpy but < 75,000 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	CHLOROBENZENE	>= 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
001319-77-3	CRESYLIC ACID	>= 10 tpy
000156-62-7	CYANAMIDE, CALCIUM SALT (1:1)	>= 10 tpy
000057-12-5	CYANIDE	>= 10 tpy
000334-88-3	DIAZOMETHANE	>= 10 tpy
000132-64-9	DIBENZOFURAN	>= 10 tpy
000075-09-2	DICHLOROMETHANE	>= 10 tpy
000131-11-3	DIMETHYL PHTHALATE	>= 10 tpy
000067-64-1	DIMETHYL KETONE	>= 250 tpy but < 75,000 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-CHLORO	>= 10 tpy
000106-93-4	ETHANE, 1,2-DIBROMO	>= 10 tpy
000075-00-3	ETHANE, CHLORO	>= 10 tpy
000067-72-1	ETHANE, HEXACHLORO	>= 10 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
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

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0NY100-00-0	HAP	>= 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
007647-01-0	HYDROGEN CHLORIDE	>= 10 tpy
007664-39-3	HYDROGEN FLUORIDE	>= 10 tpy
000078-83-1	ISOBUTYL ALCOHOL	>= 250 tpy but < 75,000 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
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
000074-83-9	METHYL BROMIDE	>= 10 tpy
000074-87-3	METHYL CHLORIDE	>= 10 tpy
000107-30-2	METHYL CHLOROMETHYLETHER	>= 10 tpy
000078-93-3	METHYL ETHYL KETONE	>= 10 tpy
000060-34-4	METHYL HYDRAZINE	>= 10 tpy
000074-88-4	METHYL IODIDE	>= 10 tpy
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
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



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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
0NY075-02-5	PM 2.5	>= 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
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
000107-13-1	PROPENENITRILE	>= 10 tpy
000123-38-6	PROPIONALDEHYDE	>= 10 tpy
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
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
007550-45-0	TITANIUM TETRACHLORIDE	>= 10 tpy
000108-88-3	TOLUENE	>= 10 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

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:



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- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
 - (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
 - (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 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



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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)

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.



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ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

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

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

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

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

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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
-- FACILITY	ECL 19-0301	112	Powers and Duties of the Department with respect to air pollution control
U-00015/-/K14	40CFR 52-A.21	80, 81	Prevention of Significant Deterioration
U-00015/-/K15	40CFR 52-A.21	92, 93	Prevention of Significant Deterioration
U-00051/32102/K18/32111	40CFR 52-A.21	104	Prevention of Significant Deterioration
U-00015/-/K13	40CFR 52-A.21(r) (6)	66, 67, 68, 69, 70, 71, 72, 73, 74, 75	Method for calculating actual emissions.
FACILITY	40CFR 60-A	39	General provisions
U-00015/-/K14	40CFR 60-D.42 (a) (1)	82	Standard for Particulate Matter
U-00015/-/K15	40CFR 60-D.42 (a) (1)	94	Standard for Particulate Matter
U-00015/-/K14	40CFR 60-D.42 (a) (2)	83	Standard for Particulate Matter
U-00015/-/K15	40CFR 60-D.42 (a) (2)	95	Standard for Particulate Matter
U-00015/-/K14	40CFR 60-D.43 (a) (1)	84	Sulfur Dioxide Standard: for liquid fossil fuel or liquid fossil fuel and wood residue.
U-00015/-/K15	40CFR 60-D.43 (a) (2)	96	Sulfur Dioxide Standard: for solid fossil fuel or solid fossil fuel and wood residue.
U-00015/-/K14	40CFR 60-D.44 (a) (2)	85	Standard of Nitrogen Oxides Liquid Fossil Fuel
U-00015/-/K15	40CFR 60-D.44 (a) (3)	97	Standard of Nitrogen Oxides for Solid Fossil Fuel
U-00015/-/K14	40CFR 60-D.45 (a)	86	Emissions and Fuel Monitoring Requirements.



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U-00015/-/K15	40CFR 60-D.45 (a)	98	Emissions and Fuel Monitoring Requirements.
U-00015/-/K14	40CFR 60-D.45 (g)	87	Exemption of Sulfur Dioxide CEM Requirements.
U-00015/-/K15	40CFR 60-D.45 (g)	99	Exemption of Sulfur Dioxide CEM Requirements.
FACILITY	40CFR 63-DDDDD	1 -9	Boilers and Process Heaters Major Source NESHP rule
U-00015	40CFR 64	58, 59, 1 -11, 1 -12	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	21, 22	Chemical accident prevention provisions
FACILITY	40CFR 82-F	23	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.3	24	False Statement.
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.1 (b)	25	Permitting
FACILITY	6NYCRR 201-1.4	1 -13	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	26, 27, 40, 41	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	15	General conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	2, 1 -1	General conditions Fees
FACILITY	6NYCRR 201-6.5 (a) (8)	16	General conditions
FACILITY	6NYCRR 201-6.5 (c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	1 -2	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	17	Compliance schedules
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5 (f)	28	Operational flexibility
U-00015	6NYCRR 201-6.5 (f)	42	Operational

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FACILITY U-00015	6NYCRR 201-6.5(f)(6) 6NYCRR 202-1	18 43		flexibility Off Permit Changes Emission Testing, Sampling and Analytical Determinations Required emissions tests.
FACILITY	6NYCRR 202-1.1	19, 1	-4	Emission Statements - Applicability Emission Statements - record keeping requirements. Control Measures for an Air Pollution Episode
FACILITY	6NYCRR 202-2.1	7		General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 202-2.5	8		General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 207	37		General Process Emission Sources - emissions from new sources and/or modifications
FACILITY	6NYCRR 211.1	1	-5	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 211.2	114, 1	-14	General Process Emission Sources - emissions from new processes and/or modifications
U-00051/32106	6NYCRR 212.4(a)	118		General Process Emission Sources - emissions from new processes and/or modifications
U- 00051/32102/K18/32111	6NYCRR 212.4(c)	103		General Process Emission Sources - emissions from new processes and/or modifications
U- 00051/32106/K18/321AD	6NYCRR 212.4(c)	106		General Process Emission Sources - emissions from new processes and/or modifications
U- 00051/32107/K18/32106	6NYCRR 212.4(c)	108		General Process Emission Sources - emissions from new processes and/or modifications
U- 00051/M9001/K18/M9001	6NYCRR 212.4(c)	110		General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.5(e)	38		Applicable emission standards
U- 00051/32102/K18/321AA	6NYCRR 212.6(a)	105		General Process Emission Sources - opacity of emissions limited
U- 00051/32106/K18/321AD	6NYCRR 212.6(a)	107		General Process Emission Sources - opacity of emissions limited
U- 00051/32107/K18/321AE	6NYCRR 212.6(a)	109		General Process Emission Sources - opacity of emissions limited
U- 00051/M9001/K18/M90AA	6NYCRR 212.6(a)	111		General Process Emission Sources - opacity of emissions

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FACILITY	6NYCRR 215	9	limited
FACILITY	6NYCRR 215.2	1 -3	Open Fires
U-00015/-/K15	6NYCRR 225-1.2 (a) (1)	88, 89	Open Fires - Prohibitions
U-00015	6NYCRR 225-1.2 (d)	44, 45	Sulfur in Fuel Limitations Pre January 1, 1988 (SIP standards).
U-00015	6NYCRR 225-1.5 (a)	46, 47	Sulfur-in-fuel limitations - Table 2 General Variances
U-00015	6NYCRR 225-1.7	48	Fuel Mixtures.
U-00035/-/PTC	6NYCRR 226	102	Emission and fuel monitoring.
U-00015/-/K07	6NYCRR 227.2 (b) (1)	61	SOLVENT METAL CLEANING PROCESSES
U-00015/-/K12	6NYCRR 227-1.2 (a) (1)	62	Particulate emissions.
U-00015/-/K13/321AG	6NYCRR 227-1.2 (a) (4)	76	Particulate Emissions from Liquid Fuels.
U-00015/-/K13/321AH	6NYCRR 227-1.2 (a) (4)	77	Particulate Emissions Firing Solid Fuels.
U-00015/-/K13/321AI	6NYCRR 227-1.2 (a) (4)	78	Particulate Emissions Firing Solid Fuels.
U-00015	6NYCRR 227-1.3 (a)	49	Particulate Emissions Firing Solid Fuels.
U-00015	6NYCRR 227-1.4 (a)	115	Smoke Emission Limitations.
U-00015	6NYCRR 227-1.4 (b)	50	Stack Monitoring.
U-00015	6NYCRR 227-1.4 (c)	51	(see narrative)
U-00015	6NYCRR 227-1.4 (d)	52	Stack Monitoring
U-00015	6NYCRR 227-2	53, 54, 55	Stack Monitoring
U-00015/-/K15	6NYCRR 227-2.4 (a) (1)	90	Reasonably available control technology for NOx
U-00015/-/K13	6NYCRR 227-2.4 (a) (2)	64	Control requirements for very large boilers.
U-00015/-/K07	6NYCRR 227- 2.4 (c) (1) (iv)	60	This is the control requirements for very large boilers not listed in 227- 2.4 (a) (1).
U-00015	6NYCRR 227-2.6	56	Control requirements for midsized boilers firing fuels other than gas, distillate oil or residual oil.
U-00015/-/K12	6NYCRR 227-2.6 (a) (1)	63	Testing, monitoring, and reporting requirements
U-00015/-/K13	6NYCRR 227-2.6 (a) (1)	65	Testing, monitoring, and reporting requirements for very large boilers.
U-00015/-/K14	6NYCRR 227-2.6 (a) (1)	79	Testing, monitoring, and reporting requirements for very large boilers.



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U-00015/-/K15	6NYCRR 227-2.6(a)(1)	91	Testing, monitoring, and reporting requirements for very large boilers.
U-00035/-/K25	6NYCRR 229.3(e)(2)(v)	100	Volatile organic liquid storage tanks
U-00035/-/K25	6NYCRR 229.5(d)	101	Recordkeeping - VOL storage tanks
U-00015	6NYCRR 237-1.4(c)(1)	116	Limited exemption-applicability
U-00015	6NYCRR 242-1.4(b)	117	CO2 Budget Trading Program - Limited exemption - units w/ electrical output to the grid restricted by permit conditions
FACILITY	6NYCRR 243-1	1 -6	CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-2	1 -7	General Provisions
FACILITY	6NYCRR 243-8	1 -8	CAIR Designated Representative for CAIR NOx Ozone Season Sources
U-00015/-/K12	6NYCRR 249	1 -15, 1 -16	Monitoring and reporting - CAIR NOx Ozone Season Trading Program
U-00015	6NYCRR 249.3(f)	1 -10	Best Available Retrofit Technology
			Each BART determination established by the Department will be submitted to the EPA for approval as a SIP revision.

Applicability Discussion:

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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



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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.

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



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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.

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.



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6 NYCRR Part 215

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.

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 52.21

This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions;

ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i) .

40 CFR 52.21 (r) (6)

For modification projects where netting procedures have been used to "net out" of New Source Review requirements (ie. demonstrate that the project's predicted emission increases remain below the facility's contemporaneous increases), a five year cap is imposed to ensure that emissions of the subject contaminants remain below the predicted emission rates used in the netting exercise.

40 CFR 60.42 (a) (1)

This regulation limits the source to 0.10 pounds per million Btu emissions of particulate matter while firing fossil fuel or wood.

40 CFR 60.42 (a) (2)

This regulation limits the opacity of emissions of emissions from fossil fuel fired steam generators. Opacity is the degree to which emissions reduce the transmission of light and obscure the view of an object in the background of the emission plume. The limit for opacity is 20%; for one six minute period, the average opacity may not more than 27%.

40 CFR 60.43 (a) (1)



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This regulation requires that the sulfur dioxide emissions, while firing liquid fossil fuel or liquid fossil fuel and wood residue, not exceed 0.80 lb/mmBtu

40 CFR 60.43 (a) (2)

This regulation requires that the sulfur dioxide emissions, when firing solid fossil fuel or solid fossil fuel and wood residue, not exceed 1.2 lb/mmBtu

40 CFR 60.44 (a) (2)

This regulation specifies that the emissions of nitrogen oxide, while firing liquid fossil fuel, liquid fossil fuel and wood residue, or gaseous fossil fuel and wood residue, must not exceed 0.30 lb/mmBtu

40 CFR 60.44 (a) (3)

This regulation specifies that the emissions of nitrogen oxide, while firing solid fossil fuel or solid fossil fuel and wood residue, must not exceed 0.70 lb/mmBtu

40 CFR 60.45 (a)

This regulation requires the owner or operator of a source that burns fossil fuel to install, calibrate, maintain, and operate continuous emissions monitoring equipment for nitrogen oxides, sulfur dioxide, opacity, and either oxygen or carbon dioxide

40 CFR 60.45 (g)

This regulation requires the source owner or operator to report excess emissions of opacity, oxides of nitrogen, and sulfur dioxide. It also requires what must be included in the excess emissions reports.

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 63, Subpart DDDDD

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP emissions. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

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.



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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 201-1.1 (b)

This regulation requires owner or operators of facilities with emissions to the atmosphere to obtain a permit. The type of permit (Title V, State Facility or Registration) will depend on the amount of pollutants emitted.

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 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.

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 (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 (e)

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

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 225-1.2 (a) (1)

This regulation provides the specific limits for the amount of sulfur in the fuel being burned at the facility.

6 NYCRR 225-1.2 (d)

The sulfur-in-fuel limitations for residual and distillate oil and for solid fuel are listed in Tables 1,2 and 3 or 6 NYCRR Part 225-1.2(c), (d) and (e)

6 NYCRR 225-1.5 (a)

This regulation allows for the use of a fuel with a sulfur content greater than that allowed on Tables 1,2 or 3 of 6 NYCRR Part 225-1.2 if the source owner can show that the emissions of sulfur dioxide do not exceed the amount allowed using the equation cited in this regulation



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6 NYCRR 225-1.7

This regulation requires the use of continuous emissions monitors to monitor the emissions of sulfur dioxide. This applies to facilities with a total heat input greater than 250 million BTU per hour, are equipped with approved sulfur dioxide control equipment and are subject to the sulfur dioxide equivalent emission rate pursuant to 6 NYCRR Part 225-1.5(a).

6 NYCRR 227.2 (b) (1)

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

6 NYCRR 227-1.2 (a) (1)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units of greater than 250 mmBtu/hr heat input capacity which fire coal, oil, or coal derived fuels.

6 NYCRR 227-1.2 (a) (4)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units which fire solid fuels at variable sizes of heat input (mmBtu/hr).

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 227-1.4 (a)

Subdivisions (a) and (f) of this section (227-1.4) have not been approved by EPA and have not been included in the NYS SIP.

6 NYCRR 227-1.4 (b)

This regulation requires the specific contents of excess emissions reports for opacity from facilities that employ continuous opacity monitors (COMs).

6 NYCRR 227-1.4 (c)

This is the applicability section for requiring the use of COMs for monitoring purposes.

6 NYCRR 227-1.4 (d)

This section allows the owner or operator of a facility subject to this section to use alternative monitoring instead of a COM or CEMS. The owner or operator must show that these systems would not provide accurate readings of emissions; would be too expensive; or cannot be installed due to physical limitations of the stack.

6 NYCRR 227-2.4 (a) (1)

This condition lists the emission limitations for very large boilers.

6 NYCRR 227-2.4 (a) (2)

This condition lists the emission limitations for very large boilers.

6 NYCRR 227-2.4 (c) (1) (iv)

This regulation allows the owner or operator of a mid-size boiler to propose an alternative control



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technology based upon the technical infeasibility of the prerequisite technologies or limits.

6 NYCRR 227-2.6

This regulation establishes the compliance testing, monitoring, and reporting requirements for NOx RACT affected stationary combustion installations.

6 NYCRR 227-2.6 (a) (1)

This regulation establishes the monitoring requirements for NOx RACT affected very large boilers (boilers with a heat input of greater than 250 mmBtu/hr).

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

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

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 237-1.4 (c) (1)

This citation imposes limits on electrical output to the grid from subject generating units to avoid further requirements of Part 237.

6 NYCRR 242-1.4 (b)

This regulation requires that any unit that, on or before December 1, 2008, applies for a enforceable permit condition restricting the supply of the unit's annual electrical output to the electric grid to less than or equal to 10 percent of the annual gross generation of the unit, and that from and after January 1, 2009 complies with the 10 percent restriction and the provisions in Paragraph (b)(3) of this Section, shall be exempt from the requirements of 6 NYCRR Part 242, except for the provisions of this Section, Sections 242-1.2, 242-1.3, and 242-1.6 of this Part

6 NYCRR 249.3 (f)

This regulation requires that each BART determination established by the department is submitted to the USEPA for approval as a revision to the State Implementation Plan.

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.



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6 NYCRR Part 226

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

6 NYCRR Part 249

This regulation restricts the emissions of visibility-impairing pollutants by requiring the installation of Best Available Retrofit Technology (BART) on certain stationary sources identified under the rule to reduce regional haze and restore natural visibility conditions to Federal Class I Areas.

6 NYCRR Subpart 202-1

This subpart of Part 202 establishes the general criteria for verifying emissions by means of emissions sampling, testing and associated analytical determinations.

6 NYCRR Subpart 227-2

This regulation limits the emission of oxides of nitrogen (NO_x) from stationary combustion installations (boilers, combustion turbines and internal combustion engines).

6 NYCRR Subpart 243-1

This part establishes the New York State component of the Clean Air Interstate Rule (CAIR) NO_x Ozone Season Trading Program, which is designed to mitigate interstate transport of ozone and nitrogen oxides, an ozone precursor. The department authorizes the administrator to assist the department in implementing the CAIR NO_x Ozone Season Trading Program by performing the functions set forth for the administrator in this Part.

6 NYCRR Subpart 243-2

This subpart describes the requirements of the CAIR designated representative which represent the facility with regard to all matters under the CAIR program.

6 NYCRR Subpart 243-8

This subpart of the rule describes all of the monitoring and reporting requirements for compliance with the CAIR NO_x Ozone Season Trading Program.

Compliance Certification

Summary of monitoring activities at KODAK OPERATIONS AT EASTMAN BUSINESS PARK:

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Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

U-00015/-/K14	80	record keeping/maintenance procedures
U-00015/-/K14	81	intermittent emission testing
U-00015/-/K15	92	record keeping/maintenance procedures
U-00015/-/K15	93	intermittent emission testing
U-00051/32102/K18/32111	104	monitoring of process or control device parameters as surrogate
U-00015/-/K13	66	work practice involving specific operations
U-00015/-/K13	67	work practice involving specific operations
U-00015/-/K13	68	work practice involving specific operations
U-00015/-/K13	69	work practice involving specific operations
U-00015/-/K13	70	work practice involving specific operations
U-00015/-/K13	71	work practice involving specific operations
U-00015/-/K13	72	work practice involving specific operations
U-00015/-/K13	73	work practice involving specific operations
U-00015/-/K13	74	work practice involving specific operations
U-00015/-/K13	75	work practice involving specific operations
FACILITY	39	record keeping/maintenance procedures
U-00015/-/K14	82	intermittent emission testing
U-00015/-/K15	94	intermittent emission testing
U-00015/-/K14	83	continuous emission monitoring (cem)
U-00015/-/K15	95	continuous emission monitoring (cem)
U-00015/-/K14	86	record keeping/maintenance procedures
U-00015/-/K15	98	record keeping/maintenance procedures
U-00015/-/K14	87	record keeping/maintenance procedures
U-00015/-/K15	99	record keeping/maintenance procedures
FACILITY	1-9	record keeping/maintenance procedures
U-00015	1-11	monitoring of process or control device parameters as surrogate
U-00015	1-12	monitoring of process or control device parameters as surrogate
U-00015	58	monitoring of process or control device parameters as surrogate
U-00015	59	monitoring of process or control device parameters as surrogate
FACILITY	27	record keeping/maintenance procedures
FACILITY	1-2	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
U-00015	43	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
U-00051/32102/K18/32111	103	monitoring of process or control device parameters as surrogate
U-00051/32106/K18/321AD	106	monitoring of process or control device parameters as surrogate
U-00051/32107/K18/32106	108	monitoring of process or control device parameters as surrogate
U-00051/M9001/K18/M9001	110	monitoring of process or control device parameters as surrogate
U-00051/32102/K18/321AA	105	record keeping/maintenance procedures
U-00051/32106/K18/321AD	107	record keeping/maintenance procedures
U-00051/32107/K18/321AE	109	record keeping/maintenance procedures
U-00051/M9001/K18/M90AA	111	record keeping/maintenance procedures
U-00015/-/K15	88	work practice involving specific operations
U-00015/-/K15	89	work practice involving specific operations
U-00015	44	work practice involving specific operations
U-00015	45	work practice involving specific operations
U-00015	46	record keeping/maintenance procedures



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U-00015	47	record keeping/maintenance procedures
U-00015	48	record keeping/maintenance procedures
U-00035/-/PTC	102	record keeping/maintenance procedures
U-00015/-/K07	61	record keeping/maintenance procedures
U-00015/-/K12	62	intermittent emission testing
U-00015/-/K13/321AG	76	intermittent emission testing
U-00015/-/K13/321AH	77	intermittent emission testing
U-00015/-/K13/321AI	78	intermittent emission testing
U-00015	49	monitoring of process or control device parameters as surrogate
U-00015	115	monitoring of process or control device parameters as surrogate
U-00015	50	record keeping/maintenance procedures
U-00015	53	record keeping/maintenance procedures
U-00015	54	record keeping/maintenance procedures
U-00015	55	record keeping/maintenance procedures
U-00015/-/K15	90	continuous emission monitoring (cem)
U-00015/-/K13	64	continuous emission monitoring (cem)
U-00015/-/K07	60	work practice involving specific operations
U-00015	56	record keeping/maintenance procedures
U-00035/-/K25	101	record keeping/maintenance procedures
U-00015	116	record keeping/maintenance procedures
U-00015	117	record keeping/maintenance procedures
FACILITY	1-6	record keeping/maintenance procedures
U-00015/-/K12	1-15	record keeping/maintenance procedures
U-00015/-/K12	1-16	record keeping/maintenance procedures
U-00015	1-10	record keeping/maintenance procedures

**Basis for Monitoring
BASIS (Law or Regulation)**

DESCRIPTION

6NYCRR Part 201-1.1(b)

A condition has been included which reflects Kodak's agreement with the operator of their boilers, SUEZ-DEGs of Rochester (Duke Energy) and assigns responsibility for compliance assurance and reporting for the boilers included in this permit to SUEZ-DEGs.

6NYCRR Part 201-6

Requires record keeping, reporting and Department staff access to facility for inspections.

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

Requires compliance certification reporting.

6NYCRR Part 201-6.5(e)

Sets compliance reporting requirements.

6NYCRR Part 201-6.5(f)

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



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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(g)

This is the citation used to reference non-applicable requirements, such as 6 NYCRR Part 231-2.

6 NYCRR Part 201-7

Fuel use limits have been placed on Boilers 13 & 14 in order to create the emission reductions necessary to offset the proposed emission increases to follow the Boiler 42 & 43 modifications. Under this citation, conditions have been included in the permit which limit coal use at Boilers 13 & 14 to 20,000 tons per year for each boiler for 2007 and beyond. Correlating emission limits for the five contaminants subject to the PSD netting analysis are included in a separate capping condition. Emissions are limited as follows: SO₂: 889.5 tpy; PM-10: 41.7 tpy; PM: 39.8 tpy; NO_x: 126.1 tpy; Sulfuric Acid Mist: 9.6 tpy. Emission calculations are based on some actual test data (PM), CEMs data (NO_x) and published emission factors.

6NYCRR Part 202-1

Requires testing and reporting of particulate emissions to demonstrate compliance with existing permit.

6NYCRR Part 202-2.1

Sets emission statement reporting deadline.

6 NYCRR Part 204 NO_x Budget

Repeal of Part 204 filed 4/6/10, effective 30 days after filing. Since Part 204 has been repealed, conditions citing Part 204 have been removed from the permit. NO_x budget requirements under the Clean Air Interstate Rule (CAIR) No_x Ozone Season Trading Program are included under 6 NYCRR Part 243.

6NYCRR Part 212.4(c)

Requires monitoring of control equipment parameters to indicate mandated control of emissions.

6NYCRR Part 212.6(a)

Requires semiannual monitoring or monitoring at Department request of opacity emissions and semiannual reporting.

6NYCRR Part 225-1.2(d)

Sets limits on the sulfur content of liquid and solid fuels.

6NYCRR Part 225-1.7



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Requires sampling, analysis and reporting of sulfur in fuels.

6 NYCRR Part 227-1 Stationary Combustion Installations

6NYCRR Part 227-1.2(a)(1)

Requires stack testing to demonstrate compliance with regulatory particulate emission limits.

6NYCRR Part 227-1.2(a)(4)

Requires stack testing to demonstrate compliance with regulatory particulate emission limits.

6NYCRR Part 227-1.3(a)

Specifies the opacity limit for combustion sources equipped with Continuous Opacity Monitors. (COMS). The associated monitoring requirements are found under 227-1.4 permit conditions.

6NYCRR Part 227-1.4(a)

Requires continuous monitoring of opacity, oxygen and carbon dioxide in boiler exhaust gases.

6NYCRR Part 227-1.4(b)

Requires reporting of specific opacity monitoring data.

6NYCRR Part 227-2 Reasonably Available Control Technology (RACT) for Major Facilities of Oxides Of Nitrogen (NO_x)

6NYCRR Part 227-2.4(a)(1)

In accordance with Kodak's NO_x RACT Plan, a condition is included which establishes limits for Boiler 44 and continuous monitoring of NO_x emissions.

6NYCRR Part 227-2.4(a)(2)

Establishes limits for Boilers 41, 42 and 43 and continuous monitoring of NO_x emissions.

6NYCRR Part 227-2.4(c)(1)(iv)

Sets limit on the amount of oil burned in package boilers 1-4 to limit NO_x emissions as per the NO_x RACT Plan.

6NYCRR Part 227-2.6

Requires continuous monitoring and reporting of NO_x and CO₂ or O₂ emissions for Boilers 41, 42, 43 and 44. Specifies quarterly reporting requirements.

6NYCRR Part 227.2(b)(1)

Sets particulate emission limits for package boilers. This citation reflects the Federal standard in the SIP for particulate emissions while burning oil. For other boilers which have the capacity to burn oil, a different citation may have been used where the resulting particulate limit is equivalent or more stringent than that in the SIP.

6NYCRR Part 229.5(d)

Requires record keeping of VOC storage tank capacity.

6 NYCRR Part 231-2

A non-applicability determination has been included in the permit to state that the most recent project to upgrade the burners on 42 Boiler is not subject to the requirements of 6 NYCRR Part 231 because it does not meet the definition of a "source project" under the rule. There will be no increase in the Maximum Annual Potential (MAP) of NO_x or VOC emissions for the boilers involved in this



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permit modification or Emission Unit U-00015 as a whole. The MAP for EU U-00015 for both NOx and VOC is documented in this non-applicability determination (cited at 201-6.5(g)) in this permit. The MAP for NOx and VOC has been revised in this Renewal permit to reflect the recent shutdowns of 13, 14, 15 and 16 boiler and the Package Boiler emissions that were inadvertently excluded from the U-00015 MAP calculation in the most recent Mod-2 Permit.

6NYCRR Part 237-1.4(c)(1)

Restricts electric output to the electric grid to maintain the exempt status under the Acid Deposition Reduction (ADR) NOx Budget Trading Program.

6NYCRR Part 242-1.4(b)

Restricts electric output to the electric grid to maintain the exempt status under the Carbon Dioxide Budget Trading Program.

6NYCRR Part 243

Kodak's Boilers are required to comply with the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program. Conditions have been included under 243-1, 243-2 and 243-8 to reflect the requirements in the rule pertaining to: Maintaining NOx budget allocations, designating a CAIR program representative, and record keeping and reporting. Quarterly electronic reports required under the rule are sent directly to the Administrator.

6 NYCRR Part 249 Best Available Retrofit Technology (BART)

This Part restricts the emissions of visibility-impairing pollutants by requiring the installation of Best Available Retrofit Technology (BART) on a BART-eligible stationary source to reduce regional haze and restore natural visibility conditions to Federal Class I Areas. Two conditions have been included in the permit which reflect Kodak's BART Plan, approved November 21, 2011 (Revised March 2012). Specifically, Kodak has agreed to shut down Boiler 41 by December 31, 2013; and shut down Boiler 42 or switch from coal to natural gas power by the MACT compliance date, but no later than August 16, 2017. Boiler 43 is also subject to BART. Kodak notes in their BART Plan that they will be required to install controls on Boiler 43 to meet the requirements of the Boiler and Process Heater NESHAP (40 CFR 63 Subpart DDDDD) by the MACT compliance date.

40 CFR 52-A.21

Sets contaminant emission limits and compliance demonstration requirements for prevention of significant deterioration (PSD).

As proposed, the project to modify Boilers 42 burns at Bldg 321(Kodak Park) will not result in a significant net emissions increase and thus will not be subject to 40 CFR 52.21PSD requirements. The shut down of Bldg 31 boilers at Kodak Park resulted in significant emission reductions. These reductions, along with other permitted emission changes at the Kodak Park facility which occurred within the 5 year contemporaneous period allowed by the rule, result in a net emission reduction. Kodak's netting analysis, included in Attachment IV of their application for this project, shows that the facility-wide net emission changes for the subject pollutants do not exceed PSD significance thresholds.

Consistent with 40 CFR 52.21(r)(6), permit conditions have been included in the permit to ensure that emissions from Boilers 42 do not exceed the Future Projected Actual Emissions used in the netting analysis for the next five years. These limits are as follows: SO₂: 5,513.3 tpy ; PM-10: 267.1 tpy; PM-2.5: 204.5 tpy; NO_x: 1,105.9 tpy; and Sulfuric Acid Mist: 62.8 tpy. The permit conditions require that records be kept which document compliance with these emission limits



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(annual maximum limit, rolled monthly) by calculating emissions based on published emission factors & equations, fuel use data, sulfur content in fuel data, and stack test data, as specified in the permit conditions themselves.

40 CFR 60 Subpart A

Sets general conditions for determination, recording and reporting of compliance with New Source Performance Standards (NSPS).

40 CFR 60 Subpart D

40 CFR 60-D.42(a)(1)

Sets boiler particulate emission limit and requires test to demonstrate compliance.

40 CFR 60-D.42(a)(2)

Sets boiler opacity emissions limits and requires continuous monitoring to demonstrate compliance.

40 CFR 60-D.45(g)

Sets criteria for and requires reporting of excess emissions.

40 CFR 60-Kb.116b(a)

Requires retention of storage vessel compliance monitoring records.

40 CFR 63, Subpart DDDDD

This permit includes sources which will be subject to the Boiler and Process Heater NESHAP. The rule was vacated by the courts in 2007. The rule was revised and published in the Federal Register on March 21, 2011, with an effective date of May 20, 2011. Along with the publication of the rule, EPA announced that it would reconsider portions of the regulations and on May 18, 2011, EPA issued a notice staying the effective date pending the reconsideration and outcome of legal challenges. However, in January 2012 US District Court vacated EPA's stay on the rule. Therefore, the Boiler MACT rule takes effect immediately and existing sources would have to comply by March 2014.

A general "placeholder" type condition has been included in the permit to state the applicability and compliance obligations for the Subpart DDDDD (NESHAP for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters) requirements.

40 CFR 64 Compliance Assurance Monitoring (CAM)

Kodak's boilers are subject to the CAM rule with respect to Part 227-1 particulate emission limits. Conditions have been included in the permit to reflect the CAM Plan, dated September 2009. As explained in the CAM Plan, opacity is measured by using a continuous monitoring system (COM) and used as a surrogate indicator for compliance with particulate standards for each of the large coal boilers. Particulate testing was done concurrently with opacity monitoring to determine the 3 hour opacity limit which corresponds to a compliant particulate emission level. Testing under the CAM plan was done in stages. Obligations under the CAM Plan for Boilers 42 and 43 were completed first and incorporated into a previous version of the permit. Testing for Boilers 41 and 44 was then completed and surrogate opacity limits established in accordance with the Plan. This modification of the permit includes, for the first time, conditions to document the findings of this second portion of the CAM compliance plan.

Based on tests performed in June 2009, a three-hour average opacity limit for Boiler 41 was established for CAM. Testing completed in November 2009 on Boiler 44 resulted in a 9% three-hour average opacity limit for CAM purposes. A condition for each of these boilers has been included in this modification (Ren 1 Mod 1) which defines an excursion (i.e. the three hour opacity limit) and describes the operators obligations in the case of an excursion, and states record keeping and reporting requirements under CAM.



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

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