

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 8-2614-00822/00001



01/03/2007

Facility Identification Data

Name: CHAMPION PHOTOCHEMISTRY INC
Address: KODAK PARK BUILDINGS 18 AND 48|1669 LAKE AVE
ROCHESTER, NY 14615

Owner/Firm

Name: CHAMPION PHOTOCHEMISTRY INCORPORATED
Address: BUILDING 48 KODAK PARK
1669 LAKE AVE
ROCHESTER, NY 14652-3751, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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Division of Air Resources:
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1669 LAKE AVE - BLDG 48 KODAK PARK
ROCHESTER, NY 14652-3751
Phone:5854777328

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

A new Title V permit is being created to represent existing photochemical manufacturing sources in Buildings 18 & 48 located in Kodak Park. These sources are currently permitted under EU FAC001 and

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



Permit ID: 8-2614-00822/00001

01/03/2007

EU U-00027 in Eastman Kodak's Kodak Park Title V Permit, 8-2614-00205/01801. The new Title V permit may then be transferred to a new owner.

Attainment Status

CHAMPION PHOTOCHEMISTRY INC is located in the town of ROCHESTER in the county of MONROE.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

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

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

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

Facility Description

This facility, located at Buildings 48 and 18 in Kodak Park, will manufacture photographic products for the processing of film, paper and printing plates.

Permit Structure and Description of Operations

The Title V permit for CHAMPION PHOTOCHEMISTRY INC 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

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

Permit ID: 8-2614-00822/00001



01/03/2007

state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

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

CHAMPION PHOTOCHEMISTRY INC is defined by the following emission unit(s):

Emission unit FAC001 - Solvent Metal Parts Cleaners and Associated Fugitive Emissions

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

Process: 226 is located at and 048, Building 018 - Solvent metal cleaning machines located in Bldgs 18 & 48 with 6 NYCRR Part 226 applicability which would otherwise be exempt or trivial consistent with Part 201-3.

Emission unit U00027 - Photochemical manufacturing operations including material storage, powder and solution mixing, transfer and filling sources, and associated fugitive emissions.

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

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

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

Process: H19 is located at Building 048 - Raw material storage and handling operations with VOC ERP < 3 lbs/hr, including miscellaneous fugitive emission sources.

Process: H20 is located at Building 018 - Solution mixing operations with VOC ERP < 3 lbs/hr, including miscellaneous fugitive emission sources.

Process: H21 is located at Building 048 - Solution mixing operations with VOC ERP > 3 lbs/hr and RACT control, including miscellaneous fugitive emission sources.

Process: H22 is located at and 048, Building 018 - Solution filling operations with VOC ERP < 3 lbs/hr, including miscellaneous fugitive emission sources.

Process: H23 is located at and 048, Building 018 - Solution filling operations with VOC ERP > 3 lbs/hr and RACT control, including miscellaneous fugitive emission sources.

Process: H24 is located at Building 048 - Powder filling operations, including miscellaneous fugitive emission sources.

Process: H25 is located at and 048, Building 018 - Aggregate solution and powder mixing and filling operations with VOC ERP > 3 lbs/hr and RACT control, including miscellaneous fugitive emission sources.

Title V/Major Source Status

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



Permit ID: 8-2614-00822/00001

01/03/2007

CHAMPION PHOTOCHEMISTRY INC is subject to Title V requirements. This determination is based on the following information:

Facility's potential to emit (PTE) of Volatile Organic Compounds (VOC) exceeds the major source threshold of 50 tons per year (tpy).

Program Applicability

The following chart summarizes the applicability of CHAMPION PHOTOCHEMISTRY INC with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	NO
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)

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 8-2614-00822/00001

01/03/2007



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

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

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

Permit ID: 8-2614-00822/00001



01/03/2007

of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3861	PHOTOGRAPH EQUIPMENT & SUPPLIES

SCC Codes

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

SCC Code	Description
4-01-003-36	ORGANIC SOLVENT EVAPORATION COLD SOLVENT CLEANING/STRIPPING Entire Unit
3-16-040-03	PHOTOGRAPHIC PRODUCT MANUFACTURING CHEMICAL MANUFACTURING
3-16-130-01	CHEMICAL MIXING OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING STORAGE OPERATIONS
3-16-140-01	SOLVENT STORAGE OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING TRANSFER OPERATIONS FILLING OPERATIONS (NONPETROLEUM) SPECIFY PRODUCT

Facility Emissions Summary

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

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



Permit ID: 8-2614-00822/00001

01/03/2007

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
000123-31-9	1,4-BENZENEDIOL (HAP)	>= 10	tpy
000111-42-2	ETHANOL, 2,2'-IMINOBIIS- (HAP)	>= 10	tpy
000050-00-0	FORMALDEHYDE (HAP)	>= 10	tpy
0NY100-00-0	HAP	>= 25	tpy but < 40 tpy
000067-56-1	METHYL ALCOHOL (HAP)	>= 10	tpy
0NY210-00-0	OXIDES OF NITROGEN	> 0	but < 2.5 tpy
0NY075-00-0	PARTICULATES	>= 2.5	tpy but < 10 tpy
0NY075-00-5	PM-10	>= 2.5	tpy but < 10 tpy
007446-09-5	SULFUR DIOXIDE	> 0	but < 2.5 tpy
0NY998-00-0	VOC	>= 25	tpy but < 40 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 8-2614-00822/00001



01/03/2007

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

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

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

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

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

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

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

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

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

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

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

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would

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

Permit ID: 8-2614-00822/00001



01/03/2007

have been necessary in order to maintain compliance with the conditions of this permit.

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

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

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

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

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

Permit ID: 8-2614-00822/00001



01/03/2007

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 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,

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

Permit ID: 8-2614-00822/00001



01/03/2007

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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 8-2614-00822/00001



01/03/2007

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	58
FACILITY	40CFR 68	Chemical accident prevention provisions	20
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	21
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	10
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	59
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	22
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	12
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	13
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	23, 24, 29, 30
FACILITY	6NYCRR 201-6.5(a)(4)	General conditions	14
FACILITY	6NYCRR 201-6.5(a)(7)	General conditions	
Fees 2			
FACILITY	6NYCRR 201-6.5(a)(8)	General conditions	15
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5(c)(2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5(d)(5)	Compliance schedules	16
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	6
FACILITY	6NYCRR 201-6.5(f)	Operational flexibility	25, 26
FACILITY	6NYCRR 201-6.5(f)(6)	Off Permit Changes	17
FACILITY	6NYCRR 202-1.1	Required emissions tests.	18
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	60
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions	19

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 8-2614-00822/00001

01/03/2007



			limited	
U-00027/01827/H25/01806	6NYCRR 212.10(c)(4)(i)		NOx and VOC RACT required at major facilities	42
U-00027/01827/H25/01808	6NYCRR 212.10(c)(4)(i)		NOx and VOC RACT required at major facilities	44
U-00027/01827/H25/01809	6NYCRR 212.10(c)(4)(i)		NOx and VOC RACT required at major facilities	46
U-00027/01827/H25/01810	6NYCRR 212.10(c)(4)(i)		NOx and VOC RACT required at major facilities	48
U-00027/01827/H25/01811	6NYCRR 212.10(c)(4)(i)		NOx and VOC RACT required at major facilities	50
U-00027/01834/H23/01802	6NYCRR 212.10(c)(4)(i)		NOx and VOC RACT required at major facilities	51
U-00027/04818/H21/04807	6NYCRR 212.10(c)(4)(i)		NOx and VOC RACT required at major facilities	53
U-00027/04818/H23/04807	6NYCRR 212.10(c)(4)(i)		NOx and VOC RACT required at major facilities	54
U-00027/04843/H21/04803	6NYCRR 212.10(c)(4)(i)		NOx and VOC RACT required at major facilities	57
U-00027/01801	6NYCRR 212.4(a)		General Process Emission Sources - emissions from new sources and/or modifications	61
U-00027/01804	6NYCRR 212.4(a)		General Process Emission Sources - emissions from new sources and/or modifications	62
U-00027/01804/H20/01807	6NYCRR 212.4(a)		General Process Emission Sources - emissions from new sources and/or modifications	63
U-00027/01808	6NYCRR 212.4(a)		General Process Emission Sources - emissions from new sources and/or modifications	64
U-00027/01827	6NYCRR 212.4(a)		General Process Emission Sources - emissions from new sources and/or modifications	65
U-00027/01829	6NYCRR 212.4(a)		General Process Emission Sources - emissions from new sources and/or modifications	66
U-00027/01834	6NYCRR 212.4(a)		General Process Emission Sources - emissions from new sources and/or modifications	67
U-00027/04818	6NYCRR 212.4(a)		General Process Emission Sources - emissions from new sources and/or modifications	68
U-00027/04841	6NYCRR 212.4(a)		General Process Emission Sources - emissions from new sources and/or modifications	69
U-00027/04843	6NYCRR 212.4(a)		General Process Emission Sources - emissions from new sources and/or modifications	70
U-00027/04843/H21/04803	6NYCRR 212.4(a)		General Process Emission Sources - emissions from new sources and/or modifications	71

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 8-2614-00822/00001

01/03/2007



U-00027/04845	6NYCRR 212.4 (a)	General Process Emission Sources - emissions from new sources and/or modifications	72
U-00027/01801/H20/018AK	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	39
U-00027/01804/H20/01807	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	40
U-00027/01827/H25/01806	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	41
U-00027/01827/H25/01808	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	43
U-00027/01827/H25/01809	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	45
U-00027/01827/H25/01810	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	47
U-00027/01827/H25/01811	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	49
U-00027/04818	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	52
U-00027/04821/H24/04801	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	55
U-00027/04843	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	56
FACILITY	6NYCRR 212.5 (e)	Applicable emission standards	27
FACILITY	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	28
FACILITY	6NYCRR 215	Open Fires	9
F-AC001	6NYCRR 226	SOLVENT METAL CLEANING PROCESSES	31, 32
U-00027/-/H19/048AG	6NYCRR 229.3 (e) (2) (iv)	Volatile organic liquid storage tanks	33
U-00027/-/H19/048AH	6NYCRR 229.3 (e) (2) (iv)	Volatile organic liquid storage tanks	35
U-00027/-/H19/048AL	6NYCRR 229.3 (e) (2) (v)	Volatile organic liquid storage tanks	37
U-00027/-/H19/048AG	6NYCRR 229.5 (d)	Recordkeeping - VOL storage tanks	34
U-00027/-/H19/048AH	6NYCRR 229.5 (d)	Recordkeeping - VOL storage tanks	36
U-00027/-/H19/048AL	6NYCRR 229.5 (d)	Recordkeeping - VOL	38

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

Permit ID: 8-2614-00822/00001



01/03/2007

storage tanks

Applicability Discussion:

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

ECL 19-301.

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

6NYCRR Part 200-.6

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

6NYCRR Part 200-.7

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

6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

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

Permit ID: 8-2614-00822/00001



01/03/2007

6NYCRR Part 201-3.3(a)

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

6NYCRR Part 201-6

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

6NYCRR 201-6.5(a)(4)

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

6NYCRR 201-6.5(a)(7)

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

6NYCRR 201-6.5(a)(8)

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

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or

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

Permit ID: 8-2614-00822/00001



01/03/2007

measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

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

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

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

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

6NYCRR 201-6.5(d)(5)

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

6NYCRR Part 201-6.5(e)

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

6NYCRR 201-6.5(f)(6)

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

6NYCRR Part 202-1.1

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

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

Permit ID: 8-2614-00822/00001



01/03/2007

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

6NYCRR Part 211-.2

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

6 NYCRR Part 211.3

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

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

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

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, CHAMPION PHOTOCHEMISTRY INC has been determined to be subject to the following regulations:

6NYCRR 201-6.5 (f)

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

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

Permit ID: 8-2614-00822/00001



01/03/2007

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

VOC removal efficiency greater than 81% is considered RACT.

6NYCRR 212 .4 (a)

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

6NYCRR 212 .4 (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.

6NYCRR 212 .5 (e)

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

6NYCRR 212 .6 (a)

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

6NYCRR 226

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

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

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

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

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

6NYCRR 229 .5 (d)

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

Compliance Certification

Summary of monitoring activities at CHAMPION PHOTOCHEMISTRY INC:

Location	Type of Monitoring	Cond No.
Facility/EU/EP/Process/ES		
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	7

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



Permit ID: 8-2614-00822/00001

01/03/2007

U-00027/01827/H25/01806	monitoring of process or control device parameters as surrogate	42
U-00027/01827/H25/01808	monitoring of process or control device parameters as surrogate	44
U-00027/01827/H25/01809	monitoring of process or control device parameters as surrogate	46
U-00027/01827/H25/01810	monitoring of process or control device parameters as surrogate	48
U-00027/01827/H25/01811	monitoring of process or control device parameters as surrogate	50
U-00027/01834/H23/01802	monitoring of process or control device parameters as surrogate	51
U-00027/04818/H21/04807	monitoring of process or control device parameters as surrogate	53
U-00027/04818/H23/04807	monitoring of process or control device parameters as surrogate	54
U-00027/04843/H21/04803	monitoring of process or control device parameters as surrogate	57
U-00027/01804/H20/01807	monitoring of process or control device parameters as surrogate	63
U-00027/04843/H21/04803	monitoring of process or control device parameters as surrogate	71
U-00027/01801/H20/018AK	monitoring of process or control device parameters as surrogate	39
U-00027/01804/H20/01807	monitoring of process or control device parameters as surrogate	40
U-00027/01827/H25/01806	monitoring of process or control device parameters as surrogate	41
U-00027/01827/H25/01808	monitoring of process or control device parameters as surrogate	43
U-00027/01827/H25/01809	monitoring of process or control device parameters as surrogate	45
U-00027/01827/H25/01810	monitoring of process or control device parameters as surrogate	47
U-00027/01827/H25/01811	monitoring of process or control device parameters as surrogate	49
U-00027/04818	monitoring of process or control device parameters as surrogate	52
U-00027/04821/H24/04801	monitoring of process or control device parameters as surrogate	55
U-00027/04843	monitoring of process or control device parameters as surrogate	56
FACILITY	record keeping/maintenance procedures	28
F-AC001	record keeping/maintenance procedures	31
F-AC001	record keeping/maintenance procedures	32
U-00027/-/H19/048AL	record keeping/maintenance procedures	37
U-00027/-/H19/048AG	record keeping/maintenance procedures	34
U-00027/-/H19/048AH	record keeping/maintenance procedures	36
U-00027/-/H19/048AL	record keeping/maintenance procedures	38

Basis for Monitoring

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)

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



Permit ID: 8-2614-00822/00001

01/03/2007

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

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

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

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

This facility's operations includes 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. Contemporaneously with making a change from one operating scenario to another, the permittee 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.

6NYCRR Part 202-2 Emission Statements

6NYCRR Part 202-2.1

Sets annual mission statement reporting deadline.

6NYCRR Part 212 General Process Emission Sources

Part 212.4(a)

This facility includes sources which are subject to control requirements under Part 212.4(a) Table 2 for formaldehyde. These sources are equipped with wet scrubbers to minimize emissions. Monitoring conditions have been included in the permit which require that a minimum recycle water flow rate be maintained in these scrubbers to assure proper control of formaldehyde. Flow rate is to be checked weekly for continuous compliance.

Part 212.4(c)

This facility includes sources which are subject to the 0.050 grains/dscf particulate standard under Part 212.4(c). Numerous wet scrubbers are operated for controlling particulate emissions to meet the standard. Monitoring conditions have been included in the permit which require that a minimum recycle water flow rate be maintained in these scrubbers to assure proper control of particulate emissions. The minimum required flow rate varies depending on the scrubber's size and manufacturer's suggested operating conditions. Flow rate is to be checked weekly for continuous compliance.

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

Permit ID: 8-2614-00822/00001



01/03/2007

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(c).

This facility does not include emission sources which require continuous opacity monitoring devices. Generally, the sources in this permit which are subject to the 20% opacity standard are controlled particulate sources which rarely have problems with opacity. For these sources, 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.

Part 212.10(c)(4)(i)

This facility includes VOC emission sources which are subject to the requirements under Part 212.10(c)(4)(1) which specifies that sources equipped with a capture system and control device with an overall removal efficiency of at least 81% are equipped with Reasonably Available Control Technology (RACT). Numerous wet scrubbers are operated for controlling VOC emissions to meet this requirement. Monitoring conditions have been included in the permit which require that a minimum recycle water flow rate be maintained in these scrubbers to assure proper control of particulate emissions. The minimum required flow rate varies depending on the scrubber's size and manufacturer's suggested operating conditions. Flow rate is to be checked weekly for continuous compliance.

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 for these sources (under prior Kodak ownership) 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.

The solvent metal cleaners included in this permit (EU FAC001) 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). Specifically, Part 201-3.2(c)(39) provides an exemption from permitting for solvent metal cleaners which meet certain size and solvent criteria. For the purpose of demonstrating compliance at these smaller degreasers, the permit conditions have been revised to

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 8-2614-00822/00001



01/03/2007

specify that the operator must note any deviations from the requirements in the log book.

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.