



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

Permit ID: 8-2614-00823/00001

Renewal Number: 1

03/28/2012

Facility Identification Data

Name: CARESTREAM HEALTH AT EASTMAN BUSINESS PARK

Address: 1049 W RIDGE RD

ROCHESTER, NY 14615

Owner/Firm

Name: CARESTREAM HEALTH INC

Address: 150 VERONA ST

ROCHESTER, NY 14608, 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: SHARON M RUCINSKI

Address: CARESTREAM HEALTH INC

1049 W RIDGE RD

ROCHESTER, NY 14615

Phone:5856278615

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

Application for renewal of Air Title V Facility. There are no major modifications to the permit at this time. Minor changes to the Renewal Permit include the following:

- Revised building nomenclature to indicate that Building 214 is now identified as Bldg 1049.
- Updated condition citations to reflect the new subpart designation for 6 NYCRR Part 228-1 surface coating requirements;
- Additional permit conditions to address 40 CFR 63 Subpart T rule revisions since the initial permit



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which specify a facility-wide limit on solvents used in solvent metal cleaning units;

- Revisions to the list of contaminants subject to 6 NYCRR Part 212.4 control requirements based on revised coating formulations approved in June 2010 in accordance with the permitted operational flexibility plan, and;
- Addition of two state-enforceable 6 NYCRR Part 212 monitoring conditions to specify operating requirements for the scrubber system associated with the Regenerative Thermal Oxidizer (RTO) (EP 03101) and coating machine 99. The coating machine is subject to 40 CFR 63 Subpart JJJJ Paper and Other Web Coating MACT which requires testing and compliance monitoring for the capture efficiency and control of HAPs via the RTO. The MACT rule does not include any requirements for the associated scrubber which controls Hydrogen Chloride emissions resulting from the RTO. The facility will monitor the pH and flow rate of the scrubber solution to ensure proper removal of HCl emissions at EP 03101.

No emission sources have been identified that would be subject to 40 CFR 64 Compliance Assurance Monitoring (CAM) requirements for the facility. The coating machine, equipped with the RTO, is exempt from CAM under 40 CFR 64.2(b)(1)(i) because it is subject to the federal NESHAP (40 CFR Subpart JJJJ). There are no other emission units equipped with a control device which have potential pre-control emissions at major source levels- the applicability criteria stated at 40 CFR 64.2(a)(3).

Attainment Status

CARESTREAM HEALTH 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:

Carestream Health, Inc. at Eastman Business Park, consists of former Kodak health imaging manufacturing and research operations located in Buildings 1049 (previously 214), 12, 14, 31, 42, 81, and 117. The facility manufactures image intensifying screens and other health imaging and non-health imaging products. Operations include solvent cleaning, small scale polymer and chemical manufacturing, particle milling processes, paper/plastic and other web coating operations, image intensifying screen manufacturing, product finishing, product finishing and assembly, and R & D operations.



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Permit Structure and Description of Operations

The Title V permit for CARESTREAM HEALTH 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 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.

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

Emission unit U00069 - Surface coating and general process emission sources associated with Health Imaging intensifying screen manufacturing, including equipment associated with mixing, material processing, precipitation, reduction operations, product finishing/assembly, and associated fugitive emissions.

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

01210, 10491, 11706, 117A0

Process: J01 is located at Building 117 -

Process: J07 is located at Building 117 -

Emission unit U00040 - Web coating operations, including surface treatment, grid ionizers, solution delivery, and solvent cleaning operations associated with the manufacture of x-ray screens and other health imaging applications, and associated fugitive emissions.

Emission unit U00040 is associated with the following emission points (EP):

01413, 01425, 01426, 01427, 01428, 03101

Process: J02 is located at Building 014 -

Process: J03 is located at Building 014 -

Process: J04 is located at Building 014 -

Process: J05 is located at Building 014 -

Process: J06 is located at Building 014 -

Process: J08 is located at Building 014 -

Process: J09 is located at Building 014 -

Process: J13 is located at Building 014 -



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CARESTREAM HEALTH AT EASTMAN BUSINESS PARK is subject to Title V requirements. This determination is based on the following information:

The facility, comprised of health imaging operations previously owned by Eastman Kodak, has potential emissions of VOC in excess of the Title V major facility threshold (50 tpy) and potential emissions of individual HAPs and total HAPs in excess of the Title V major facility thresholds of 10 tpy and 25 tpy, respectively. The facility is subject to 40 CFR 63 Subpart JJJJ (Paper and Other Web Coating MACT).

Program Applicability

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

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

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



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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 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.

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SCC Code	Description
3-16-050-01	PHOTOGRAPHIC PRODUCT MANUFACTURING SURFACE TREATMENTS
3-16-050-02	SURFACE COATING OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING SURFACE TREATMENTS
3-16-120-02	GRID IONZERS PHOTOGRAPHIC PRODUCT MANUFACTURING CLEANING OPERATIONS
3-16-160-03	GENERAL CLEANING OPERATIONS PHOTOGRAPHIC PRODUCT MANUFACTURING OTHER OPERATIONS MISCELLANEOUS MANUFACTURING - OPERATIONS

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	Range
		lbs/yr	
000109-60-4	ACETIC ACID PROPYL ESTER		> 0 but < 2.5 tpy
000079-20-9	ACETIC ACID, METHYL ESTER		> 0 but < 2.5 tpy
000110-82-7	CYCLOHEXANE		> 0 but < 2.5 tpy
000075-09-2	DICHLOROMETHANE		> 0 but < 10 tpy
000067-64-1	DIMETHYL KETONE		>= 25 tpy but < 40 tpy
000646-06-0	DIOXACYCLOPENTANE, 1,3-		> 0 but < 2.5 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO		> 0 but < 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO		> 0 but < 10 tpy
000122-99-6	ETHANOL, 2-PHENOXY		>= 10 tpy
000141-78-6	ETHYL ACETATE		> 0 but < 2.5 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)		> 0 but < 2.5 tpy



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000068-12-2	FORMAMIDE, N,N-DIMETHYL	> 0 but < 10 tpy
068606-21-3	GLYCOLS, C10-16	>= 2.5 tpy but < 10 tpy
0NY100-00-0	HAP	>= 10 tpy but < 25 tpy
000110-54-3	HEXANE	> 0 but < 10 tpy
007647-01-0	HYDROGEN CHLORIDE	> 0 but < 10 tpy
000067-63-0	ISOPROPYL ALCOHOL	>= 10 tpy but < 25 tpy
000067-56-1	METHYL ALCOHOL	> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	> 0 but < 2.5 tpy
0NY075-00-0	PARTICULATES	>= 25 tpy but < 40 tpy
0NY075-00-5	PM-10	>= 25 tpy but < 40 tpy
000071-23-8	PROPANOL	> 0 but < 2.5 tpy
000109-99-9	TETRAHYDROFURAN	> 0 but < 2.5 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 250 tpy but < 75,000 tpy
001330-20-7	XYLENE, M, O & P MIXT.	> 0 but < 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:

- (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.



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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

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

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

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

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



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

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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	72, 73	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 61-M	33	Asbestos standards for: asbestos mills, manufacturing



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U- 00040/03101/J02/014AD	40CFR 63-JJJJ.3350 (e)	59, 60	operations using asbestos, and other sources Paper and Other Web Coating NESHAP - monitoring for a non- catalytic oxidizer
U- 00040/03101/J02/014AD	40CFR 63-JJJJ.3350 (f)	61	Paper and Other Web Coating NESHAP - Monitoring of capture systems
U- 00040/03101/J02/014AD	40CFR 63-JJJJ.3370 (e)	62	Paper and Other Web Coating NESHAP - Compliance Demonstration - 95/98% control option
U- 00040/03101/J02/014AD	40CFR 63- JJJJ.3370 (k) (2)	63	Calculation of HAP control efficiency.
U- 00040/03101/J02/014AD	40CFR 63- JJJJ.3370 (k) (3)	64	Oxidizer compliance.
U- 00040/03101/J02/014AD	40CFR 63-JJJJ.3400 (c)	65	Paper and Other Web Coating NESHAP - reporting - semiannual compliance report
U- 00040/03101/J02/014AD	40CFR 63-JJJJ.3400 (g)	66	Paper and Other Web Coating NESHAP - reporting - startup/shutdown/malf unction reports
U- 00040/03101/J02/014AD	40CFR 63-JJJJ.3410	67	Paper and Other Web Coating NESHAP - Recordkeeping requirements
FACILITY	40CFR 63-JJJJ.Tbl 2	36	Subpart A requirements for Subpart JJJJ
U-00040/-/J05	40CFR 63-T.460 (b)	48	
U-00040/-/J05	40CFR 63-T.462 (a) (2)	49	
U-00040/-/J05	40CFR 63-T.462 (c)	50	
FACILITY	40CFR 63-T.471 (b) (2)	34	Facility Wide Solvent Emission Limits Demonstration of Compliance With Facility Wide Solvent Emission Limit Reporting of Solvent Emissions
U-00040/-/J05	40CFR 63-T.471 (c)	51	
FACILITY	40CFR 63-T.471 (h)	35	
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.3	23	False Statement.
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	74	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of

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FACILITY	6NYCRR 201-3.2 (a)	13	reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.3 (a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	24, 25, 37, 38	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.5 (a) (4)	15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	2	General conditions
FACILITY	6NYCRR 201-6.5 (a) (8)	16	General conditions
FACILITY	6NYCRR 201-6.5 (c)	3	Fees
FACILITY	6NYCRR 201-6.5 (c) (2)	4	General conditions
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	17	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance schedules
FACILITY	6NYCRR 201-6.5 (f)	26	Compliance Certification
U-00040	6NYCRR 201-6.5 (f) (1)	39	Operational flexibility
FACILITY	6NYCRR 201-6.5 (f) (6)	18	Alternate operating scenarios
FACILITY	6NYCRR 201-6.5 (g)	27	Off Permit Changes
FACILITY	6NYCRR 202-1.1	19, 20	Permit shield
FACILITY	6NYCRR 202-2.1	7	Required emissions tests.
FACILITY	6NYCRR 202-2.5	8	Emission Statements - Applicability
FACILITY	6NYCRR 207	28	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	29	Control Measures for an Air Pollution Episode
FACILITY	6NYCRR 211.2	75	General Prohibitions - air pollution prohibited
U-00040/01413	6NYCRR 212.10 (c) (4) (iii)	55	General Prohibitions - visible emissions limited.
U-00040/01413	6NYCRR 212.4 (a)	77, 78	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00040/01425	6NYCRR 212.4 (a)	79	General Process Emission Sources - emissions from new sources and/or modifications

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U-00040/01425/J05	6NYCRR 212.4 (a)	80	emissions from new sources and/or modifications General Process Emission Sources - emissions from new sources and/or modifications
U-00040/01426/J02/014AU	6NYCRR 212.4 (a)	81	General Process Emission Sources - emissions from new sources and/or modifications
U-00040/01427	6NYCRR 212.4 (a)	82	General Process Emission Sources - emissions from new sources and/or modifications
U-00040/01427/J08	6NYCRR 212.4 (a)	83	General Process Emission Sources - emissions from new sources and/or modifications
U-00040/01428	6NYCRR 212.4 (a)	84	General Process Emission Sources - emissions from new sources and/or modifications
U-00040/03101	6NYCRR 212.4 (a)	85, 86, 87	General Process Emission Sources - emissions from new sources and/or modifications
U-00069/10491	6NYCRR 212.4 (a)	88	General Process Emission Sources - emissions from new sources and/or modifications
U-00069/11706	6NYCRR 212.4 (a)	89	General Process Emission Sources - emissions from new sources and/or modifications
U-00069/117A0	6NYCRR 212.4 (a)	90	General Process Emission Sources - emissions from new sources and/or modifications
U-00040/01413	6NYCRR 212.4 (c)	53	General Process Emission Sources - emissions from new processes and/or modifications
U-00069/01210	6NYCRR 212.4 (c)	68	General Process Emission Sources - emissions from new processes and/or modifications
U-00069/117A0/J01/117AB	6NYCRR 212.4 (c)	71	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.5 (d)	76	Applicable emission



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FACILITY	6NYCRR 212.5 (e)	30	standards
U-00040/01413	6NYCRR 212.6 (a)	54	Applicable emission standards
U-00069/01210	6NYCRR 212.6 (a)	69	General Process Emission Sources - opacity of emissions limited
U-00069/117A0	6NYCRR 212.6 (a)	70	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
U-00040/-/J09	6NYCRR 226	52	SOLVENT METAL CLEANING PROCESSES
FACILITY	6NYCRR 228-1.1 (d)	31	Will remain subject
FACILITY	6NYCRR 228-1.1 (e) (13)	32	Low-use specialty-type operation non-applicability
U-00040/-/J02	6NYCRR 228-1.10	47	Handling, storage and disposal of VOCs
U-00040/-/J02	6NYCRR 228-1.3 (c)	40	Solids as applied
U-00040/01426/J02	6NYCRR 228-1.4	56	Opacity
U-00040/03101	6NYCRR 228-1.4	57	Opacity
U-00040/-/J02	6NYCRR 228-1.5 (b)	41	Use of Methods 311 or 24.
U-00040/-/J02	6NYCRR 228-1.5 (c)	42	Alternate sampling and analysis methods
U-00040/-/J02	6NYCRR 228-1.5 (d)	43	Department Access to Obtain Samples
U-00040/03101/J02/014AD	6NYCRR 228-1.5 (g)	58	continuous monitoring of air cleaning device
U-00040/-/J02	6NYCRR 228-1.5 (j)	44	Record of noncompliance
U-00040/-/J02	6NYCRR 228-1.6 (a)	45	Prohibition of Sale
U-00040/-/J02	6NYCRR 228-1.6 (b)	46	Prohibition of Specification

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



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6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

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



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to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.5 (c)

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

6 NYCRR 201-6.5 (c) (2)

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

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

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

6 NYCRR 201-6.5 (d) (5)

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

6 NYCRR 201-6.5 (e)

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

6 NYCRR 201-6.5 (f) (6)

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

6 NYCRR 201-6.5 (g)

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

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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



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the previous calENDar year.

6 NYCRR 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and 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, CARESTREAM HEALTH AT EASTMAN BUSINESS PARK has been determined to be subject to the following regulations:

40 CFR 63.3350 (e)

Monitoring condition specifies the minimum operating tempature of the RTO, as demonstrated during the Dec 2008 performance test, to assure compliance with the emission standard in §63.3320(b)(1) for 95% reduction of HAPs. Conditions also detail the requirements for installing, operating, maintaining the continuous data monitor and recorder.

40 CFR 63.3350 (f)

Specifies the requirements for facility-specific monitoring plan which details the procedures for maintaining and monitoring the Permanent Total Enclosure (PTE) around the coating machine to demonstrate capture efficiency.

40 CFR 63.3370 (e)

This condition requires the facility to operate its capture system and control device such that the overall organic HAP control efficiency for surface coating operations (ES 014AD) is at least 95% for each month.



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40 CFR 63.3370 (k) (2) (i)

This condition provides the equation to be used to calculate the overall organic HAP removal efficiency for surface coating operations (ES 014AD).

40 CFR 63.3370 (k) (3) (i)

This condition clarifies how the facility can operate its capture system and thermal oxidizer in order to be in compliance with the emission standard specified at 40 CFR 63.3320(b). The oxidizer must operate at an average operating value parameter greater than the operating parameter value established by 40 CFR 63.3360(e) for each 3-hour period. The capture system must maintain an operating parameter at an average value greater than or less than (as appropriate) the operating parameter established in accordance with 40 CFR 63.3350(f).

40 CFR 63.3400 (c)

This condition requires the facility to submit semiannual compliance reports by July 31 (for January 1 - June 30) and January 31 (for July 1 - December 31) each year.

40 CFR 63.3400 (g)

The condition requires submission of startup, shutdown and malfunction reports as specified in 40 CFR 63.10(d)(5).

40 CFR 63.3410

This condition specifies a list of records that the facility must maintain on a monthly basis. The records must be kept for at least 5 years after each occurrence that requires record keeping. The latest 2 years must be kept on site and readily available and the remaining 3 years may be kept off site or on computer.

40 CFR 63.460 (b)

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

40 CFR 63.462 (a) (2)

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

40 CFR 63.462 (c)

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

40 CFR 63.471 (b) (2)

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



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40 CFR 63.471 (c)

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

40 CFR 63.471 (h)

Sets requirements for solvent emission report.

40 CFR 63.Tbl 2

This condition refers the applicant to the requirements of 40 CFR 63 Subpart A that are applicable to facilities subject to 40 CFR 63 Subpart JJJJ.

40 CFR Part 61, Subpart M

This is the National Emission Standard for Asbestos and it includes provisions for handling and disposing of asbestos.

6 NYCRR 200.3

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

6 NYCRR 201-6.5 (f)

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

6 NYCRR 201-6.5 (f) (1)

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

6 NYCRR 211.1

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

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



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

6 NYCRR 212.4 (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 (d)

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

6 NYCRR 212.5 (e)

If a process emission source meets certain other requirements the source is considered as having met the 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 228-1.1 (d)

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

6 NYCRR 228-1.1 (e) (13)

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



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6 NYCRR 228-1.10

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

6 NYCRR 228-1.3 (c)

This citation specifies removal efficiency for an air cleaning device used as a control strategy. The air cleaning device must achieve an overall removal efficiency of the lower of 85% removal or the removal determined using the equation specified in 6 NYCRR part 228.3(c).

6 NYCRR 228-1.4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6 NYCRR 228-1.5 (b)

This citation requires the owner and operator of any emission source subject to Part 228 to, upon request by the Department, use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, to measure the volatile content, water content, density, volume of solids and weight of solids in order to determine the actual VOC content of an applied coating during a compliance demonstration.

6 NYCRR 228-1.5 (c)

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

6 NYCRR 228-1.5 (d)

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

6 NYCRR 228-1.5 (g)

This citation requires continuous monitoring of key operating parameters when an air cleaning device is used.

6 NYCRR 228-1.5 (j)

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

6 NYCRR 228-1.6 (a)



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

6 NYCRR 228-1.6 (b)

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

6 NYCRR Part 207

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

6 NYCRR Part 226

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

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	40 CFR Part 64	COMPLIANCE ASSURANCE MONITORING

Reason: No emission sources have been identified that would be subject to 40 CFR 64 Compliance Assurance Monitoring (CAM) requirements for the facility. The coating machine, equipped with the RTO (EP 03101), is exempt from CAM under 40 CFR 64.2(b)(1)(i) because it is subject to the federal NESHAP (40 CFR Subpart JJJJ). There are no other emission units equipped with a control device which have potential pre-control emissions at major source levels- the applicability criteria stated at 40 CFR 64.2(a)(3).

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state

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only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at CARESTREAM HEALTH AT EASTMAN BUSINESS PARK:

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

U-00040/03101/J02/014AD	59	record keeping/maintenance procedures
U-00040/03101/J02/014AD	60	monitoring of process or control device parameters as surrogate
U-00040/03101/J02/014AD	61	record keeping/maintenance procedures
U-00040/03101/J02/014AD	62	monitoring of process or control device parameters as surrogate
U-00040/03101/J02/014AD	63	record keeping/maintenance procedures
U-00040/03101/J02/014AD	64	record keeping/maintenance procedures
U-00040/03101/J02/014AD	65	record keeping/maintenance procedures
U-00040/03101/J02/014AD	66	record keeping/maintenance procedures
U-00040/03101/J02/014AD	67	record keeping/maintenance procedures
U-00040/-/J05 FACILITY	50	record keeping/maintenance procedures
U-00040/-/J05 FACILITY	34	record keeping/maintenance procedures
U-00040/-/J05 FACILITY	51	record keeping/maintenance procedures
U-00040/-/J05 FACILITY	35	record keeping/maintenance procedures
U-00040/-/J05 FACILITY	5	record keeping/maintenance procedures
U-00040/-/J05 FACILITY	6	record keeping/maintenance procedures
U-00040/-/J05 FACILITY	26	record keeping/maintenance procedures
U-00040 FACILITY	39	record keeping/maintenance procedures
U-00040 FACILITY	7	record keeping/maintenance procedures
U-00040/01413	55	record keeping/maintenance procedures
U-00040/01413	78	record keeping/maintenance procedures
U-00040/01425	79	record keeping/maintenance procedures
U-00040/01427	82	record keeping/maintenance procedures
U-00040/03101	85	monitoring of process or control device parameters as surrogate
U-00040/03101	86	monitoring of process or control device parameters as surrogate
U-00040/03101	87	monitoring of process or control device parameters as surrogate
U-00040/01413	53	record keeping/maintenance procedures
U-00069/01210	68	record keeping/maintenance procedures
U-00069/117A0/J01/117AB	71	monitoring of process or control device parameters as surrogate
U-00040/01413	54	record keeping/maintenance procedures
U-00069/01210	69	record keeping/maintenance procedures
U-00069/117A0	70	record keeping/maintenance procedures
U-00040/-/J09 FACILITY	52	record keeping/maintenance procedures
U-00040/-/J09 FACILITY	32	record keeping/maintenance procedures
U-00040/-/J02	47	record keeping/maintenance procedures
U-00040/01426/J02	56	record keeping/maintenance procedures
U-00040/03101	57	record keeping/maintenance procedures
U-00040/03101/J02/014AD	58	monitoring of process or control device parameters as surrogate
U-00040/-/J02	44	record keeping/maintenance procedures



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Basis for Monitoring

DESCRIPTION OF MONITORING REQUIREMENTS

6 NYCRR Part 201 Permits and Registrations

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

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

6NYCRR Part 201-6.5(e)

Requires submittal and specifies content of annual compliance certification reports.

6NYCRR Part 201-6.5(f)

This facility-specific condition 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 permit includes a variety of Emission Sources which are permitted under more than one operating scenario. These operating scenarios are defined by Processes within Emission Units U-00040 and U-00069, where multiple Processes share the same equipment, but operate the shared equipment in different ways or in a manner that triggers different applicable requirements. Specifically, these Emission Sources include, but are not limited to:

1) Surface coating equipment subject to 6 NYCRR Part 228 that complies using a combination of compliant coatings, an approved coating system, and the Part 228 exemption for Research and Development processes; and

2) Equipment used for solvent metal cleaning where the solvent may contain no VOCs, may contain VOCs and be subject to the requirements of 6 NYCRR Part 226, and/or may contain halogenated solvents and be subject to the requirements of 40 CFR Part 63, Subpart T;

Contemporaneously with making a change from one operating scenario to another, the operator 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



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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

6NYCRR Part 212.4(a)

Requires monitoring of control equipment and/or process parameters and record keeping to monitor emissions of regulated toxic contaminants. Sets control requirements for regulated contaminants. Specifies emission limits for regulated contaminants based on Best Available Control Technology (BACT) determinations, which are required to be re-evaluated every 5 years. Emissions are limited on a 12 month rolling basis. Emissions are calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations.

For emission sources which are equipped with a control device, such as the Surface Coating Operations (ES 014AD), a condition has been included to specify the required operating parameters to ensure that the demonstrated control efficiency is maintained. Generally, a source with an applicable federal Maximum Achievable Control Technology (MACT) rule will have Part 212.4(a) BACT monitoring conditions which mirror the MACT requirements. In the case of the new Regenerative Thermal Oxidizer (ES 031AA) a minimum operating temperature is specified.

Two additional Part 212.4(a) monitoring conditions have been added to specify operating requirements for the scrubber system associated with the Regenerative Thermal Oxidizer (RTO) (EP 03101) and coating machine 99. The coating machine is subject to 40 CFR 63 Subpart JJJJ Paper and Other Web Coating MACT which requires testing and compliance monitoring for the capture efficiency and control of HAPs via the RTO. The MACT rule does not include any requirements for the associated scrubber which controls Hydrogen Chloride emissions resulting from the RTO. The facility will monitor the pH and flow rate of the scrubber solution to ensure proper removal of HCl emissions at EP 03101.

6NYCRR Part 212.4(c)

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

Permit conditions are included for this purpose which require monitoring of control equipment and/or process parameters and/or periodic maintenance and record keeping to indicate mandated control of particulate emissions. For example, the pressure drop across a dry particulate filter (baghouse, HEPA filter, etc...) is required to ensure that the filter is intact and providing the collection efficiency as designed.

Many particulate sources subject to Part 212.4(c) do not need a control device to comply with the 0.05 grains/dscf particulate standard. For example, small scale mixing and pouring operations typically have very low particulate emission rates. In these cases, process knowledge, operating conditions, emission sampling data and calculations, and other information from the permit file are used to assess and demonstrate on-going compliance. For such sources, the permit requires that on a semiannual basis, the owner/operator review all of the data and operating parameters related to the particulate emission rate (ex. production rate, raw material supply, air flow etc..) to verify the accuracy of the reported particulate emission rate. Additionally, the permit condition requires that



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they investigate and correct any instance where there is cause to believe that particulate emissions above 0.05 grains/dscf are occurring or have occurred. If there is still a doubt as to whether the standard is being met, the Department may require a particulate stack test at any time.

6NYCRR Part 212.6(a)

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

The particulate emission sources in this permit do not warrant continuous opacity monitors. Some, due to their very small potential emissions or their minimal operating time, typically have negligible or very short term (less than six minutes) opacity (a small scale pouring operation, for example). Others may have the potential to emit significant particulate emissions, but due to the high level of particulate controls required by the permit are highly unlikely to exceed the opacity standard except during a process upset. Generally, for these sources which do not have continuous opacity monitors the permit requires a visible observation on a semi-annual frequency. The permit condition also requires that any instance where there is cause to believe that visible emissions have the potential to exceed the standard must be investigated and followed-up with EPA Method 9 assessment if not corrected within one operating day. If there is still a doubt as to whether the standard is being met, the Department may conduct, or require, a Method 9 assessment for compliance at any time.

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

Permit conditions establish RACT (Reasonably Available Control Technology) limits for volatile organic compounds (VOCs), monitoring and record keeping of process parameters or process material quantities to demonstrate compliance and on-going re-evaluation of RACT. Emissions are limited on a 12 month rolling basis. Emissions are calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations.

6NYCRR Part 215.2 Open Fires Prohibition

A new mandatory condition has been added to this permit for the prohibition of open burning.

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.

Cleaners subject to these requirements are included in EUs U-00040 and F-AC001. These are small cleaners which may have been considered "insignificant activities" (ie. cleaners that would be eligible for an exemption from permitting under Part 201 if not for their applicability to Part 226 or 40 CFR 63 Subpart T). Specifically, Part 201-3.2(c)(39) provides an exemption from permitting for solvent metal cleaners which meet certain size and solvent criteria.. For the purpose of demonstrating compliance at these smaller degreasers, the permit conditions specify that the operator must note any deviations from the requirements in the log book.

6NYCRR Part 228 Surface Coating Processes



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6NYCRR Part 228.1(e)(13)

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

6 NYCRR Part 228.3(c)

This condition states that an air cleaning device (i.e. RTO) must be designed and operated to provide, at a minimum, an overall removal efficiency of either 85 percent or as determined by the equation provided in the condition.

6 NYCRR Part 228.3(d)

The condition which stated the requirements for compliance with Part 228 VOC RACT by using "coating system" provisions is no longer applicable since the installation of the control device and has been removed from the permit.

6NYCRR Part 228.4

The regulation of opacity at 6 NYCRR Part 228.4 does not specify periodic monitoring. Therefore, the permit must contain periodic monitoring to demonstrate compliance with the 20% opacity limit. Surface coating sources subject to Part 228.4, such as the surface coating operations identified as Process J02 in Emission Unit U-00040, typically have very low particulate emission rates and zero or negligible opacity. Based on the particulate emission calculations and other permit file information, it is unlikely that these sources would have opacity in excess of 20 percent in a 6 minute period. In such cases, a visible observation on a semi-annual frequency was permitted. The permit condition also requires that any instance where there is cause to believe that visible emissions have the potential to exceed the standard must be investigated and followed-up with EPA Method 9 assessment if not corrected within one operating day.

6NYCRR Part 228.5(a)

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

6NYCRR Part 228.5(c)

Includes provisions for alternate sampling and analysis methods for compliance with 228.5(a).

6 NYCRR Part 228.5(g)

This condition includes the operating requirements to ensure that the Regenerative Thermal Oxidizer (RTO)(Control ID 031AA) achieves at least 85% removal efficiency required by VOC RACT. The minimum operating temperature in the RTO (continuously monitored on a three hour block average basis) was established by the performance test conducted on December 8, 2008.

6 NYCRR Part 228.5(j)

A condition has been included for the relatively new requirements for reporting non-compliance under Part 228.

6NYCRR Part 228.6(b)

Requires seller of a coating to provide user with certification of the VOC content of the coating.

6 NYCRR Part 228.7

This condition, which specified the VOC content limits for complaint coatings and was used in



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conjunction with the "coating system" designation prior to the installation of the control device (i.e. RTO), is no longer applicable. This condition has been removed from the permit.

6NYCRR Part 228.10

These conditions establish prescriptive work practice requirements under 228.10, such as the proper handling and storage of solvents and solvent-laden rags. The containers subject to these requirements are small and may be categorized as "insignificant activities" (ie. containers that would otherwise be eligible for an exemption from permitting under Part 201 if not for the work practice requirements that apply because of their association with a coating line. Specifically, Part 201-3.3(c)(44) provides an exemption from permitting for storage vessels, tanks and containers with a capacity less than 750 gallons. These work practice requirements must be adhered to on a continuous basis whenever the sources are in use. The permit require that operators maintain a log in the operating area and note any open containers found as deviations to be reported to the agency.

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

40 CFR 63-T Halogenated Solvent Cleaning NESHAP

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

Specifies work practice requirements for cold solvent cleaning machines.

40 CFR 63-T.462(c)

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

40 CFR 63-T.471(b)(2)

Specifies annual limit of methylene chloride use in all metal cleaning machines.

40 CFR 63-T.471(c)

Specifies record keeping requirements for compliance with the annual emission limit for methylene chloride.

40 CFR 63-JJJJ National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating

Previously, a Special Condition was included in the permit to specify the steps the facility would take to achieve compliance with Subpart JJJJ requirements for the applicable coating source, ES 014AD. The condition included interim limits on HAPs: 10 tons per year for any single HAP and 25 tons per year for combined HAPs. As stated in the permit, these limits would be in affect until the new controls were operational. Now that compliance with the Subpart JJJJ requirements has been demonstrated (Dec 8, 2008 stack test), Condition 32, which included the MACT compliance schedule and interim limits, has been removed from the permit.

40 CFR 63-JJJJ.3320(b)(4)

This condition, which specified the general control requirements under the MACT rule for the surface coating operation (ES 014AD) (i.e.100% efficiency and outlet concentration of HAP be no greater than 20 ppm) has been removed and replaced with more specific monitoring conditions based on the test demonstration of greater than 95% removal efficiency of HAPs. These parametric monitoring conditions are included at 63.3350(e) and 63.3370(e).

40 CFR 63-JJJJ.3321(a)

This condition requires the facility to operate the collection and control equipment for the surface coating operations (ES 014AD) within the limits specified in Table 1 of 40 CFR 63 Subpart JJJJ. Now that



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specific operating limits have been established during the control device's performance testing and included in parametric monitoring conditions under 63.3350(e) and 3370(e), this condition has been removed from the permit.

40 CFR 63-JJJJ.3330(a)

This condition specified that the facility had to achieve compliance with the provisions of 40 CFR 63 Subpart JJJJ by December 5, 2005. This past requirement has been removed from the permit.

40 CFR 63-JJJJ. 3350(e)

This condition establishes the requirements applicable to the continuous parameter monitoring system (CPMS) used to monitor and record the combustion temperature of the add-on control device for the surface coating operations (ES 014AD). The minimum temperature requirement is based on the data collected during the Dec 9, 2008 performance test during which > 95% reduction of HAPs was demonstrated. The permit conditions also re-iterate the requirements to install, calibrate, maintain and operate the continuous temperature monitoring system found at §63.3350(e)(1)-(8).

40 CFR 63-JJJJ.3350(f)

The conditions requires the facility to develop and implement a site specific monitoring plan for the capture and control system used to control emissions from the surface coating operations (ES 014AD).

40 CFR 63-JJJJ.3360(e)(1)

This condition required an initial performance test to be conducted on the new Regenerative Thermal Oxidizer (RTO). The condition specified a minimum of 3 one hour test runs be performed simultaneously at the inlet and outlet of the thermal oxidizer. The condition also outlined the test methods to be used and the calculation method to be followed in order to determine the HAP destruction efficiency of the thermal oxidizer. The performance test was achieved on December 9, 2008 and this past requirement has been removed from the permit.

40 CFR 63-JJJJ.3360(e)(2)

This condition requires the facility to record process information necessary to determine the conditions that exist during the performance testing done in accordance with 40 CFR 63.3360(e)(1). This was done as part of the December 9, 2008 performance test and so this condition has been removed from the permit.

40 CFR 63-JJJJ.3360(f)

This condition requires the facility to make a demonstration that the HAP capture system employed at surface coating operation (ES 014AD) is a permanent total enclosure (PTE) as defined in section 6 of EPA Method 204 of 40 CFR 51 Appendix M. This was done as part of the December 9, 2008 performance test and so this condition has been removed from the permit.

40 CFR 63-JJJJ.3370(e)

This condition requires the facility to monitor and maintain its permanent total enclosure (PTE) in accordance with the conditions that were demonstrated during the Dec 9, 2008 performance test and the site specific monitoring plan to ensure that the capture system with the control device provide at least 95% overall removal of organic HAP emissions from the surface coating operations (ES 014AD). The facility will continuously monitor the air flow across all the natural draft openings of the PTE.

40 CFR 63-JJJJ.3370(k)(1)

This condition requires the facility to demonstrate initial compliance through performance tests of capture efficiency and thermal oxidizer efficiency and continuing compliance through continuous monitoring of capture system and thermal oxidizer operating parameters that were established in accordance with 40



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CFR 63.3350 (e) & (f). This was done as part of the December 9, 2008 performance test and so this condition has been removed from the permit.

40 CFR 63-JJJJ.3370(k)(2)(i)

This condition provides the equation to be used to calculate the overall organic HAP removal efficiency for surface coating operations (ES 014AD).

40 CFR 63-JJJJ.3370(k)(3)(i)

This condition clarifies how the facility can operate its capture system and thermal oxidizer in order to be in compliance with the emission standard specified at 40 CFR 63.3320(b). The oxidizer must operate at an average operating value parameter greater than the operating parameter value established by 40 CFR 63.3360(e) for each 3-hour period. The capture system must maintain an operating parameter at an average value greater than or less than (as appropriate) the operating parameter established in accordance with 40 CFR 63.3350(f).

40 CFR 63-JJJJ.3400(c)

This condition requires the facility to submit semiannual compliance reports by July 31 (for January 1 - June 30) and January 31 (for July 1 - December 31) each year.

40 CFR 63-JJJJ.3400(d)

This condition, required the facility to submit a notification of performance test, as specified in 40 CFR 63.9(e), to be done on the capture system and thermal oxidizer. The test protocol was received on October 13, 2008 and subsequent testing was completed on December 9, 2008. Because there are no pending performance tests scheduled during the remainder of this permit term, the condition has been removed.

40 CFR 63-JJJJ.3400(e)

This condition required the facility to submit a Notification of Compliance Status as required in 40 CFR 63.9(h). The NOC was received on March 26, 2009. This past requirement has been removed from the permit.

40 CFR 63-JJJJ.3400(f)

This condition required the facility to submit the performance test report, as specified in 40 CFR 63.10(d)(2). The performance test report should have been submitted as part of the notification of compliance status required in 40 CFR 63.3400(e). The test report was received in February 2009 but was not accompanied by the NOC. Failure to submit a timely NOC, in violation of 63.3400(e) and (f), resulted in an enforcement action (Consent Order #R8-20090413-10). Now that these past requirements have been addressed, this condition has been removed from the permit.

40 CFR 63-JJJJ.3400(g)

The condition requires submission of startup, shutdown and malfunction reports as specified in 40 CFR 63.10(d)(5).

40 CFR 63-JJJJ.3410

This condition specifies a list of records that the facility must maintain on a monthly basis. The records must be kept for at least 5 years after each occurrence that requires record keeping. The latest 2 years must be kept on site and readily available and the remaining 3 years may be kept off site or on computer.

40 CFR 64 Compliance Assurance Monitoring

No emission sources have been identified that would be subject to 40 CFR 64 Compliance Assurance



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Monitoring (CAM) requirements for the facility. The coating machine, equipped with the RTO, is exempt from CAM under 40 CFR 64.2(b)(1)(i) because it is subject to the federal NESHAP (40 CFR Subpart JJJ). There are no other emission units equipped with a control device which have potential pre-control emissions at major source levels- the applicability criteria stated at 40 CFR 64.2(a)(3).