



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

**Permit ID: 8-2614-00907/00001  
04/08/2013**

**Facility Identification Data**

Name: TRUESENSE IMAGING INC  
Address: 1964 LAKE AVE|  
ROCHESTER, NY 14615

**Owner/Firm**

Name: TRUESENSE IMAGING INC  
Address: 1964 LAKE AVE  
ROCHESTER, NY 14615, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:  
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Address: TRUESENSE IMAGING INC  
1964 LAKE AVE  
ROCHESTER, NY 14615  
Phone:5857845530

**Permit Description**

**Introduction**

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

**Summary Description of Proposed Project**

This is a new Title V Permit for the Semiconductor Operations in Buildings 81 and 82 on Lake Avenue. These manufacturing operations were previously owned by Kodak and permitted as EU U-00020 in Kodak's Title V Permit. Transfer of ownership to Image Sensor Technologies Acquisition Corporation occurred on or about November 7, 2011. On December 5, 2011, the owner name changed to Truesense Imaging, Incorporated, and the facility is identified as such in this permit.



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At the time of the permit transfer (Nov 2011), Kodak’s Title V Permit Renewal was in process. The permit issued to the new owner included the appropriate portions of the most recent issued Kodak permit (2/7/07 “Mod 2” version). The transferred permit was not able to include major revisions and updates reflected in the renewal (Ren 1) version. Therefore, this Title V permit is being drafted to include the portions of Kodak’s Title V Renewal (1/1/12 “Ren 1”) involved in the transfer (EU U-00020 semiconductor operations, portions of EU FAC001 solvent metal cleaning, and portions of EU FAC003 spark ignition engines) and the accompanying updates to the process identifiers and requirements. The most significant changes to the permit include the following:

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

40 CFR 63 Subpart ZZZZ Reciprocating Internal Combustion Engines (RICE) NESHAP  
Trusense is subject to the new National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE). Conditions for the RICE rule, effective May 3, 2010, were included in the permit under Emission Unit, EU F-AC003, to represent applicable engines located throughout the facility. The applicable engines are spark ignition engines with brake HP less than or equal to 500 brake HP with a future compliance date of October 19, 2013.

40 CFR 63 Subpart BBBBB Semiconductor Manufacturing MACT

More specific conditions to satisfy the requirements of the Semiconductor MACT rule have been added under EU U-00020. The previous version of the permit included a general Subpart BBBBB applicability condition.

**Revised or Added permit conditions to address Revised Requirements**

6 NYCRR Part 201

A rule revision (effective 2/22/13) has resulted in changes to some of the Part 201 conditions. For the most part, these changes reflect a shift in the citations, but not substantive changes to condition language.

6 NYCRR Part 228

A rule revision created two subparts. Existing surface coating requirements which were previously under citations of Part 228 are now under Subpart 228-1.

6 NYCRR Part 231

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

**Attainment Status**

TRUESENSE IMAGING 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
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Particulate Matter (PM)	ATTAINMENT



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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

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\* 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:**

Semiconductor manufacturing and research operations, previously owned by Kodak, located along Lake Avenue in Buildings 81 and 82 at Eastman Business Park.

**Permit Structure and Description of Operations**

The Title V permit for TRUESENSE IMAGING 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 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.

TRUESENSE IMAGING INC is defined by the following emission unit(s):

Emission unit U00020 - Semiconductor research and manufacturing area including fabrication, mixing, filtering, cleaning operations, maintenance and associated fugitive emissions.

08101, 08102, 08103, 08104, 08105, 08109, 08110, 08111, 08121, 08122, 08137, 08228

Process: N01 is located at and 082, Building 081 - Semiconductor manufacturing with no HAP emissions subject to 40 CFR 63 Subpart BBBBB and Part 212 Table 2 requirements only

Process: N04 is located at and 082, Building 081 - Semiconductor manufacturing with organic HAP



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emissions subject to 40 CFR Part 63 Subpart BBBBBB and Part 212 Table 2 requirements only.

Process: N05 is located at Building 081 - Semiconductor manufacturing with inorganic HAP emissions subject to 40 CFR Part 63 Subpart BBBBBB and Part 212 Table 2 requirements only.

Process: N06 is located at Building 081 - Semiconductor manufacturing with combined organic and inorganic HAP emissions subject to 40 CFR Part 63 Subpart BBBBBB and Part 212 Table 2 requirements only.

Emission unit FAC001 - Facility emission unit for solvent metal parts cleaners, and associated fugitive emissions

Process: 226 is located at Building 081 - Solvent metal cleaning machines with 6 NYCRR Part 226 applicability which would otherwise be exempt or trivial consistent with Part 201-3.

Emission unit FAC003 - Facility emission unit for emergency stationary reciprocating internal combustion engines (RICE) and associated fugitive emissions

Process: SIL is located at Building 081 - Spark Ignition Engines less than or equal to 500 brake horsepower which commenced construction or reconstruction before June 12, 2006.

**Title V/Major Source Status**

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

Truesense semiconductor manufacturing operations were previously permitted under EU U-00020 of Kodak's Title V permit (8-261400205) - a major source facility. As part of a major source, the operations were subject to 40 CFR 63 Subpart BBBBBB (Semiconductor Manufacturing MACT).

Prior to the sale of these operations, Kodak contested that the potential emissions from the semiconductor operations, when considered on their own, do not exceed the major source thresholds for Hazardous Air Pollutants (HAPs) and therefore, as a new separate facility should not be considered applicable to the MACT rule. EPA has not provided a response on this issue. The Department proposes to conservatively issue the new facility a Title V permit and maintain the MACT applicability in this permit until directed otherwise.

**Program Applicability**

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

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

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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 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



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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**

3674

SEMICONDUCTORS & RELATED DEVICES

**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**

2-01-002-02

INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION  
ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS  
Reciprocating

3-13-065-99

ELECTRICAL EQUIPMENT  
ELECTRICAL EQUIPMENT - SEMICONDUCTOR MANUFACTURING

4-01-003-36

SEMICONDUCTOR MFG-MISCELLANEOUS OPERATIONS- GENERAL-SPECIFY MATERIAL  
ORGANIC SOLVENT EVAPORATION  
COLD SOLVENT CLEANING/STRIPPING  
Entire Unit

**Facility Emissions Summary**

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to

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Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000123-91-1	1,4-DIETHYLENE DIOXIDE	> 0	but < 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL	> 0	but < 10 tpy
007440-38-2	ARSENIC	> 0	but < 10 tpy
000630-08-0	CARBON MONOXIDE	> 0	but < 2.5 tpy
007782-50-5	CHLORINE	> 0	but < 10 tpy
000111-42-2	ETHANOL, 2,2'-IMINOBIS-	> 0	but < 10 tpy
000100-41-4	ETHYLBENZENE	> 0	but < 10 tpy
0NY100-00-0	HAP	>= 10	tpy but < 25 tpy
007647-01-0	HYDROGEN CHLORIDE	> 0	but < 10 tpy
007664-39-3	HYDROGEN FLUORIDE	> 0	but < 10 tpy
000067-56-1	METHYL ALCOHOL	> 0	but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	> 0	but < 2.5 tpy
007803-51-2	PHOSPHINE	> 0	but < 10 tpy
007446-09-5	SULFUR DIOXIDE	> 0	but < 2.5 tpy
0NY998-00-0	VOC	>= 40	tpy but < 50 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, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;

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(3) During the period of the emergency the facility owner 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 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 or operator seeking to establish the occurrence of an emergency has the burden of proof.

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

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

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

**Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(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 201-6.2(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 201-6.4(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 201-6.4(a)(3)**

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

**Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR**



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**201-6.4(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 201-6.4(a)(6)**

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

**Item I: Severability - 6 NYCRR Part 201-6.4(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 201-6.4(g)**

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

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

**Item K: Reopening for Cause - 6 NYCRR Part 201-6.4(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

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material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

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

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

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

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

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

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

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

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such 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

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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	48	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 61-M	28	Asbestos standards for: asbestos mills, manufacturing operations using asbestos, and other sources
FACILITY	40CFR 63-A	29	Subpart A - General Provisions apply to all NESHAP affected sources
U-00020/-/N04	40CFR 63-BBBBB.7184 (b)	45	Process vents: organic HAP emissions
U-00020/-/N05	40CFR 63-BBBBB.7184 (c)	46	Process vent: inorganic HAP emissions
U-00020/-/N06	40CFR 63-BBBBB.7184 (f)	47	Process Vents - Combined HAP emissions
U-00020	40CFR 63-BBBBB.7190 (a) (	39	Periodic compliance reports.
U-00020	40CFR 63-BBBBB.7190 (a) (	40	Immediate startup, shutdown, and malfunction report.
U-00020	40CFR 63-BBBBB.7191 (a) (	41	Notification and report requirement submittals
U-00020	40CFR 63-BBBBB.7191 (a) (	42	Startup, shutdown, and malfunctions records
U-00020	40CFR 63-BBBBB.7192	43	Form and retention of records.
U-00020	40CFR 63-BBBBB.7193	44	General provision applicability.
F-AC003/-/SIL	40CFR 63-ZZZZ.6602	33	Reciprocating Internal Combustion Engine (RICE) NESHAP - requirements for existing engines at major sources of HAP emissions
F-AC003/-/SIL	40CFR 63-ZZZZ.6625 (e)	34	Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance of



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F-AC003/-/SIL	40CFR 63-ZZZZ.6625 (f)	35	engine and control device Reciprocating Internal Combustion Engine (RICE) NESHAP - non-resettable hour meter for certain existing emergency engines
F-AC003/-/SIL	40CFR 63-ZZZZ.6625 (h)	36	Reciprocating Internal Combustion Engine (RICE) NESHAP - idling time at startup
F-AC003/-/SIL	40CFR 63-ZZZZ.6640 (f) (1)	37	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency RICE operation
F-AC003/-/SIL	40CFR 63-ZZZZ.6655 (f)	38	Reciprocating Internal Combustion Engine (RICE) NESHAP - Recordkeeping requirements
FACILITY	40CFR 68	11	Chemical accident prevention provisions
FACILITY	40CFR 82-F	12	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	5	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	49	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	6	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	7	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	8	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	9	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	13, 30	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	14	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (7)	15	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (a) (8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c)	17	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4 (c) (2)	18	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4 (c) (3) (ii)	19	Reporting Requirements -

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FACILITY	6NYCRR 201-6.4 (d) (4)	20	Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (e)	21	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (f)	22	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f) (6)	23	Operational Flexibility
FACILITY	6NYCRR 202-1.1	10	Off Permit Changes
FACILITY	6NYCRR 202-2.1	2	Required emissions tests.
FACILITY	6NYCRR 202-2.5	3	Emission Statements - Applicability
FACILITY	6NYCRR 211.1	24	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 212.4 (a)	50	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 212.5 (d)	51	General Process Emission Sources - emissions from new sources and/or modifications
FACILITY	6NYCRR 212.5 (e)	25	Applicable emission standards
FACILITY	6NYCRR 215.2	4	Applicable emission standards
F-AC001	6NYCRR 226	31	Open Fires - Prohibitions
F-AC003/-/SIL	6NYCRR 227-1.3 (a)	32	SOLVENT METAL CLEANING PROCESSES
FACILITY	6NYCRR 231-11.2 (b)	26	Smoke Emission Limitations.
FACILITY	6NYCRR 231-11.2 (c)	27	Reasonable Possibility requirements for insignificant mods - less than 50% with excluded emissions
			Reasonable Possibility requirements for insignificant mods - greater than 50% with excluded emissions

**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



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procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.4 (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 201-6.4 (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 201-6.4 (a) (8)



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

6 NYCRR 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (f) (6)

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

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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



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department representatives.

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

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

**Facility Specific Requirements**

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

40 CFR 63.6602

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

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

40 CFR 63.6625 (e)

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

40 CFR 63.6625 (f)

This condition reduces the emission of hazardous air pollutants by requiring existing emergency engines greater than or equal to 500 brake horsepower located at a major source of HAP emissions and existing



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emergency engines located at an area source of HAP emissions to install a non-resettable hour meter.

40 CFR 63.6625 (h)

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

40 CFR 63.6640 (f) (1)

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

40 CFR 63.6655 (f)

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

40 CFR 63.7184 (b)

This regulation specifies the organic HAP emission limits for each organic HAP process vent in Process N04 and specifies the facility's options for meeting these limits.

40 CFR 63.7184 (c)

This regulation specifies the inorganic HAP emission limits for each inorganic HAP process vent in Process N05 and specifies the facility's options for meeting these limits.

40 CFR 63.7184 (f)

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

40 CFR 63.7190 (a) (1)

This citation details the requirements for the semiannual compliance reporting for the Subpart BBBBB



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MACT rule.

40 CFR 63.7190 (a) (2)

This citation details the requirements for the required startup, shutdown, malfunction plan (SSMP).

40 CFR 63.7191 (a) (1)

This citation specifies the required documentation of key compliance notifications related to Subpart BBBBB.

40 CFR 63.7191 (a) (2)

This citation specifies the required documentation related to startup, shutdown, and malfunctions.

40 CFR 63.7192

This citation specifies the general record keeping requirements for Subpart BBBBB compliance.

40 CFR 63.7193

This citation specifies the General requirements of 40 CFR 63 Subpart A and SSMP.

40 CFR Part 61, Subpart M

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

40 CFR Part 63, Subpart A

The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40 CFR 63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that describe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

6 NYCRR 201-6.4 (a) (4)



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This mandatory requirement applies to all Title V facilities. It requires the permittee to provide any 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 201-6.4 (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 201-6.4 (a) (8)

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

6 NYCRR 201-6.4 (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 201-6.4 (c) (2)

This requirement applies to all facilities subject to Title V requirements and 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 201-6.4 (c) (3) (ii)

This regulation specifies compliance reporting requirements, including 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 201-6.4 (d) (4)

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.



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6 NYCRR 201-6.4 (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 201-6.4 (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 211.1

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

6 NYCRR 212.4 (a)

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

6 NYCRR 212.5 (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 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 231-11.2 (b)

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



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6 NYCRR 231-11.2 (c)

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

6 NYCRR 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.

**Compliance Certification**

**Summary of monitoring activities at TRUESENSE IMAGING INC:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
-----		
U-00020/-/N04	45	record keeping/maintenance procedures
U-00020/-/N05	46	record keeping/maintenance procedures
U-00020/-/N06	47	record keeping/maintenance procedures
U-00020	39	record keeping/maintenance procedures
U-00020	40	record keeping/maintenance procedures
U-00020	41	record keeping/maintenance procedures
U-00020	42	record keeping/maintenance procedures
U-00020	43	record keeping/maintenance procedures
U-00020	44	record keeping/maintenance procedures
F-AC003/-/SIL	33	record keeping/maintenance procedures
F-AC003/-/SIL	34	record keeping/maintenance procedures
F-AC003/-/SIL	35	record keeping/maintenance procedures
F-AC003/-/SIL	36	record keeping/maintenance procedures
F-AC003/-/SIL	37	record keeping/maintenance procedures
F-AC003/-/SIL	38	record keeping/maintenance procedures
FACILITY	19	record keeping/maintenance procedures
FACILITY	21	record keeping/maintenance procedures
FACILITY	22	record keeping/maintenance procedures
FACILITY	2	record keeping/maintenance procedures
F-AC001	31	record keeping/maintenance procedures
F-AC003/-/SIL	32	monitoring of process or control device parameters as surrogate
FACILITY	26	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
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**Basis for Monitoring**

**DESCRIPTION OF MONITORING REQUIREMENTS**



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**6 NYCRR Part 201 Permits and Registrations**

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

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

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

Requires submittal and specifies content of annual compliance certification reports.

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

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

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.

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

**6NYCRR Part 202-2.1**

Sets annual mission statement reporting deadline.

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

These conditions establish equipment specifications, operating requirements, and work practice standards for 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.

Some of the cleaners subject to these requirements are small and may be considered "insignificant activities" (ie. cleaners that would be eligible for an exemption from permitting under Part 201 if not for their applicability to Part 226 or 40 CFR 63 Subpart T). Specifically, Part 201-3.2(c)(39) provides an exemption from permitting for solvent metal cleaners which meet certain size and solvent criteria. The cold cleaners in this category include those identified in the permit as EU FAC001. 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.

As specified by the rule, cold cleaning degreasers must be equipped with 1) a cover that operates easily, 2) an internal (under cover) drainage facility, if practical, and 3) a control system. The log kept for purposes described above will also be used to indicate whether the cleaner is equipped with an internal drainage facility. According to the rule-making guidance, "internal drainage facility" refers to the rack or basket for dripping parts to minimize solvent carry-out. Parts must be allowed to drain until dripping stops (at least 15 seconds).



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**6NYCRR Part 227 Stationary Combustion Installations**

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

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

**6NYCRR Part 228-1 Surface Coating Processes**

A previously permitted source subject to Part 228 has been taken out of service and removed from this permit. Process N03 was included in the permit transferred from Kodak to permit a Spin on Glass (SOG) tool (identified as Emission Source 081AT) which was used to coat wafers containing quartz. This source complied with Part 228 by using the low-use surface coating exemption under 6 NYCRR 228-1.1(e)(13). The facility has maintained records which indicated that the SOG tool was not run after 2006 and was placed out of service in 2009 (prior to the permit transfer to Truesense Imaging). Therefore, this process, the associated equipment and Part 228 requirements have been removed from the permit.

**6NYCRR Part 231 New Source Review for New and Modified Facilities**

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

**6 NYCRR Part 231-11.2**

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

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

**40 CFR 63-A General Provisions**

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

**40 CFR 63- ZZZZ Reciprocating Internal Combustion Engines NESHAP**

Truesense operates one spark-ignition (SI) back up power generator subject to the emission limitations and operating limits for hazardous air pollutants (HAPs) emitted from stationary reciprocating internal combustion engines (RICE). Conditions for the RICE rule, effective May 3, 2010, were included in this Renewal permit under Emission Unit, EU F-AC003. The future compliance date of October 19, 2013 is specified by the rule.

**40 CFR 63.6602**

Monitoring conditions under this citation include the applicable maintenance requirements (i.e. inspection and oil change frequency) specified in Table 2c of the rule.

**40 CFR 63.6625(e)**

Conditions under this citation state the record keeping requirements associated with good operation and maintenance of the applicable engine and after-treatment control device (if any).

**40 CFR 63.6625(f)**

Conditions under this citation state the requirement to have a non-resettable hour meter on each applicable engine.



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**40 CFR 63.6625(h)**

Conditions under this citation specify the restriction of the start-up period when other operating and maintenance requirements do not apply. Operators are required to minimize idle time during start up of the engine and limit the start up period to 30 minutes.

**40 CFR 63.6640(f)**

Conditions under this citation include the requirements for demonstrating compliance with the operating limits for emergency stationary engines. In order to be considered an emergency engine, limitations on the hours of operation apply. Paragraph (f)(1) describes the limitations for emergency stationary RICE with ratings less than or equal to 500 bHP (Processes SIL).

**40 CFR 63.6655(f)**

Conditions under this citation state the record keeping requirements that apply to emergency engines less than 500 bHP. Using the hour meter required under 63.6625(f), the operators must document the hours of operation of each engine.

**40 CFR 63- BBBB Semiconductor Manufacturing NESHAP**

**40 CFR 63 -BBBBB.7184(b)**

Specifies limits and compliance monitoring for uncontrolled process vent streams in EU U-00020emitting organic HAPs.

**40 CFR 63 -BBBBB.7184(c)**

Specifies limits and compliance monitoring for uncontrolled process vent streams in EU U-00020emitting inorganic HAPs.

**40 CFR 63 -BBBBB.7184(f)**

Specifies limits and compliance monitoring for uncontrolled process vent streams in EU U-00020emitting a combination of inorganic and organic HAPs, known as "combined HAP" streams. Because the uncontrolled combined vent streams at the facility are below the standard, compliance standard will be demonstrated by engineering assessment just as it is done for vent streams subject to the separate inorganic and organic standards. 63.7187(b) includes provisions which allow for this type of compliance demonstration (using data review and emissions calculations). Perhaps by oversight, this section did not get updated when EPA added the combined standard to the rule. Kodak cited 63.7187(b) in their engineering reassessment for the combined standard which was submitted to EPA on Nov 18, 2008.

**40 CFR 63 -BBBBB.7190(a)**

Specifies requirements for frequency and content of periodic compliance reports for subject processes in EU U-00020.

**40 CFR 63 -BBBBB.7191(a)**

Specifies record keeping requirements for processes in EU U-00020 subject to Subpart BBBB.

**40 CFR 63 -BBBBB.7192**

Specifies the format and duration of files to be maintained for Subpart BBBB compliance.

**40 CFR 63 -BBBBB.7193**

Specifies which of the 40 CFR 63 Subpart A General Provisions apply for Subpart BBBB sources.