**New York State Department of Environmental Conservation**

# Permit Review Report

**Permit ID: 8-2699-00126/00001**
**09/14/2015**

**Facility Identification Data**
Name: RED-ROCHESTER LLC AT EASTMAN BUSINESS PARK
Address: EASTMAN BUSINESS PARK BUILDINGS 091, 095, 311, 602, 096, R16, 031, 321, M90, 001, 027, 087, 322, 402, & 511
ROCHESTER, NY 14650-0001

**Owner/Firm**
Name: RED-ROCHESTER LLC
Address: 640 QUAIL RIDGE DR
WESTMONT, IL 60559, USA
Owner Classification: Corporation/Partnership

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## Permit Description

### Introduction

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

**Summary Description of Proposed Project**
This project is a significant modification of the Title V Facility Air Permit 8-2699-00126/00001 which includes the utility operations at Eastman Business Park owned by RED-Rochester as of September 2013. This modification application addresses RED's intentions to replace the powerhouse's current combustion infrastructure with natural gas fired turbines, heat recovery steam generating units, duct burners, and other new dual fueled boilers. PSD avoidance emissions caps for Scenario 1 and 2 are proposed to

maintain CO emissions below the significant net emissions increase threshold of 100 tons per year.

**Attainment Status**
RED-ROCHESTER LLC 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:**
RED-Rochester, LLC operations at Eastman Business Park, include the boiler operations located in Building 31 and 321 and their associated fuel oil storage, coal and ash conveyance, and boiler water operations; Kings Landing wastewater treatment operations; facility-wide solvent metal parts cleaners; facility-wide stationary combustion sources (excluding RICE) with Part 227 applicability; and facility-wide emergency RICE engines.

**Permit Structure and Description of Operations**
The Title V permit for RED-ROCHESTER LLC 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.

RED-ROCHESTER LLC AT EASTMAN BUSINESS PARK is defined by the following emission unit(s):

Emission unit U00008 - Kings Landing Wastewater Treatment Operations and Associated Fugitive Emissions

Emission unit U00008 is associated with the following emission points (EP):
09103, 09104, 09105, 09106, 09107, 09503, 09504, 09508, 09511, 09601, R1601, R1603
Process: K02 is located at Building 095 - Wastewater treatment sludge incinerartion in a Multiple Hearth Incinerator (MHI), subject to 40 CFR 63 Subpart EEE

Process: K04 is located at and 095, Building 091 - Storage tanks subject to 6 NYCRR Part 229

Process: K06 is located at & 095, R16, 096, Building 091 - General process sources associated with wastewater treatment operations

Emission unit U00015 - Building 31 and 321 Stationary Combustion Installations, including package and built up boilers used for the generation of process steam and electricity. Also includes powerhouse conversion project operating scenarios.

Process K07, K13, and K13 will be decommissioned after Process K20 - K24 equipment is fully operational. Assuming the site is fully converted to natural gas, RED will also decommission Emission Unit U-00015, Process K15.

Emission unit U00015 is associated with the following emission points (EP):
00001, 00003, 00004, 321A0, HPDF1, HPNG1, HPNG2, PGT01, PGT02, PGT03
Process: K07 is located at Building 031 - No.6 fuel oil combustion in package boilers

Process: K12 is located at Building 321 - No 6 fuel oil combustion in built-up Boilers 42 and 43

Process: K13 is located at Building 321 - Bituminous coal combustion for built-up Boilers 42 and 43

Process: K14 is located at Building 321 - No 2 fuel oil combustion for Boiler #44 Post-5D MACT Deadline

Process: K15 is located at Building 321 - Bituminous low sulfur coal combustion for Boiler #44 Pre-5D MACT Deadline

Process: K16 is located at Building 321 - Coal combustion in Boiler #44 Post-5D MACT Deadline

Process: K20 is located at Building 321 - Natural gas combustion in boiler #44 Post-5D MACT Deadline.

Process: K21 is located at Building 321 - Natural gas combustion in turbines.

Process: K22 is located at Building 321 - Natural gas combustion in heat recovery steam generating unit (HRSG).

Process: K23 is located at Building 321 - No. 2 fuel oil combustion in high and medium pressure dual fueled boilers > 250 MMBtu/hr, Post-5D MACT Deadline.

Process: K24 is located at Building 321 - Natural gas combustion in high and medium pressure dual fueled boilers > 250 MMBtu/hr, Post 5D- MACT Deadline.

Process: K25 is located at Building 321 - Boiler Feedwater Additive Storage

Process: K26 is located at Building 321 - No. 2 fuel oil combustion in high and medium pressure dual fueled boilers < 250 MMBtu/hr, Post-5D MACT Deadline.

Process: K27 is located at Building 321 - Natural gas combustion in high and medium pressure dual fueled boilers < 250 MMBtu/hr, Post-5D MACT Deadline.

Emission unit U00051 - Coal and ash handling systems, including fugitive emissions from KPS coal pile and roadway dust.

Emission unit U00051 is associated with the following emission points (EP):
32102, 32106, 32107, M9001
Process: K18 is located at and M90, Building 321 - Coal ash storage and transfer operations

Emission unit UCLEAN -

Process: 226 is located at &1,31,87,321,332, Building 027 - Solvent metal cleaning machines with 6 NYCRR Part 226 applicability which would otherwise be exempt or trivial under Subpart 201-3.

Emission unit ENGINE - Facility Emission Unit for Stationary Combustion Sources (Engines)

RED operates the following boilers:
Blg 402 (2) Cleaver Brooks and (1) Fulton natural gas fueled boilers each < 1mmbtu/hr and Blg 95 (1) Cleaver Brooks natural gas fueled boiler < 1mmbtu/hr. These boilers are exempt from Part 227 and Part 201 and are not permitted.

Bldg 95 (2) 2 and 3 mmbtu/hr Cleaver Brooks natural gas fueled boilers. These boilers are permitted under E-NGINE Process NGS and are subject to Part 227-1.3(a) and 227-2.4(d) as small combustion sources.

RED does not currently have any combustion sources under E-NGINE Process DSL.

Process: CIL is located at Building 602 - Emergency Stationary Reciprocating Internal Combustion Engines (RICE) - compression ignition (CI) engines less than 500 Brake HP which commenced
Process: DSL is located at and 095, Building 091 - Diesel-fired engines with 6 NYCRR Part 227 applicability with would otherwise be Exempt or Trivial under Subpart 201-3.

Process: EHG is located at Building 311 - Emergency Stationary Reciprocating Internal Combustion Engines (RICE) with greater than 500 Brake HP which commenced construction or reconstruction before December 19, 2002

Process: NGS is located at none at this time, Building 091 - Natural Gas-fired engines with 6 NYCRR Part 227 applicability which would otherwise be Exempt or Trivial under Subpart 201-3.

**Title V/Major Source Status**
RED-ROCHESTER LLC AT EASTMAN BUSINESS PARK is subject to Title V requirements. This determination is based on the following information:

**Program Applicability**
The following chart summarizes the applicability of RED-ROCHESTER LLC AT EASTMAN BUSINESS PARK with regards to the principal air pollution
regulatory programs:

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

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS)
for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA)
which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to
be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

**Compliance Status**
Facility is in compliance with all requirements.

**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 |
|---|---|
| 4931 | ELEC & OTHER SERVICES COMBINED |

**SCC Codes**

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

| SCC Code | Description |
|---|---|
| 1-02-002-02 | EXTERNAL COMBUSTION BOILERS - INDUSTRIAL<br>INDUSTRIAL BOILER - SUBBITUMINOUS COAL<br>Pulverized Coal: Dry Bottom |
| 1-02-002-03 | EXTERNAL COMBUSTION BOILERS - INDUSTRIAL<br>INDUSTRIAL BOILER - SUBBITUMINOUS COAL<br>Cyclone Furnace |
| 1-02-004-01 | EXTERNAL COMBUSTION BOILERS - INDUSTRIAL<br>INDUSTRIAL BOILER - RESIDUAL OIL<br>Grade 6 Oil |
| 1-02-004-03 | EXTERNAL COMBUSTION BOILERS - INDUSTRIAL<br>INDUSTRIAL BOILER - RESIDUAL OIL<br><10MMBTU/HR ** |
| 1-02-005-01 | EXTERNAL COMBUSTION BOILERS - INDUSTRIAL<br>INDUSTRIAL BOILER - DISTILLATE OIL<br>Grades 1 and 2 Oil |
| 1-02-005-02 | EXTERNAL COMBUSTION BOILERS - INDUSTRIAL<br>INDUSTRIAL BOILER - DISTILLATE OIL<br>10-100MMBTU/HR ** |
| 1-02-006-01 | EXTERNAL COMBUSTION BOILERS - INDUSTRIAL<br>INDUSTRIAL BOILER - NATURAL GAS<br>Over 100 MBtu/Hr |
| 1-02-006-02 | EXTERNAL COMBUSTION BOILERS - INDUSTRIAL<br>INDUSTRIAL BOILER - NATURAL GAS<br>10-100 MMBtu/Hr |
| 1-02-006-03 | EXTERNAL COMBUSTION BOILERS - INDUSTRIAL<br>INDUSTRIAL BOILER - NATURAL GAS<br>Less Than 10 MMBtu/Hr |
| 2-01-001-02 | INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION<br>ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL)<br>Reciprocating |
| 2-01-002-02 | INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION<br>ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS<br>Reciprocating |
| 3-01-820-02 | CHEMICAL MANUFACTURING<br>CHEMICAL MANUFACTURING - WASTEWATER AGGREGATE<br>WASTEWATER TREATMENT |
| 3-05-101-99 | MINERAL PRODUCTS<br>MINERAL PRODUCTS - BULK MATERIALS CONVEYORS<br>Other Not Classified |
| 3-16-130-02 | PHOTOGRAPHIC PRODUCT MANUFACTURING<br>STORAGE OPERATIONS<br>GENERAL STORAGE OPERATIONS |
| 4-01-003-36 | ORGANIC SOLVENT EVAPORATION<br>COLD SOLVENT CLEANING/STRIPPING<br>Entire Unit |
| 5-03-005-06 | SOLID WASTE DISPOSAL - INDUSTRIAL<br>SOLID WASTE DISPOSAL: INDUSTRIAL - INCINERATION<br>Sludge |

**Facility Emissions Summary**

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

| Cas No. | Contaminant Name | PTE lbs/yr | PTE Range |
|---|---|---|---|
| 000092-52-4 | 1, 1 BIPHENYL | | > 0 but < 10 tpy |
| 000060-29-7 | 1,1'-OXYBIS-ETHANE | | > 0 but < 2.5 tpy |
| 003268-87-9 | 1,2,3,4,6,7,8,9-OCTACHLORODIBENZODIOXIN | | > 0 but < 2.5 tpy |
| 000084-74-2 | 1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER | | > 0 but < 10 tpy |
| 000107-06-2 | 1,2-DICHLOROETHANE | | >= 10 tpy |
| 000106-99-0 | 1,3-BUTADIENE | | > 0 but < 10 tpy |
| 000497-26-7 | 1,3-DIOXOLANE,2-METHYL- C4H8O2 | | > 0 but < 2.5 tpy |
| 000123-91-1 | 1,4-DIETHYLENE DIOXIDE | | > 0 but < 10 tpy |
| 000872-50-4 | 1-METHYL-2-PYRROLIDONE | | > 0 but < 2.5 tpy |
| 000098-86-2 | 1-PHENYLETHANONE | | >= 10 tpy |
| 001746-01-6 | 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN | | >= 10 tpy |
| 000105-67-9 | 2,4 XYLENOL | | > 0 but < 2.5 tpy |
| 000121-14-2 | 2,4, DINITRO TOLUENE | | > 0 but < 10 tpy |
| 000606-20-2 | 2,6-DINITROTOLUENE | | > 0 but < 2.5 tpy |
| 000088-04-0 | 2-CHLORO-5-HYDROXY-1,3-DIMETHYLBENZENE | | > 0 but < 2.5 tpy |
| 000078-59-1 | 2-CYCLOHEXEN-1-ONE,3,5,5-TRIMETHYL | | >= 10 tpy |
| 000109-86-4 | 2-METHOXYETHANOL | | >= 10 tpy |
| 000091-57-6 | 2-METHYL NAPHTHALENE | | > 0 but < 10 tpy |
| 000108-10-1 | 2-PENTANONE, 4-METHYL | | >= 10 tpy |
| 000140-88-5 | 2-PROPENOIC ACID, ETHYL ESTER | | > 0 but < 10 tpy |
| 000096-33-3 | 2-PROPENOIC ACID, METHYL ESTER | | > 0 but < 2.5 tpy |
| 000056-49-5 | 3-METHYLCHOLANTHRENE | | > 0 but < 2.5 tpy |
| 000085-60-9 | 4,4'-BUTYLIDENE BIS[6- | | > 0 but < 2.5 tpy |

| | | |
|---|---|---|
| | TERT-BUTYL-3-METHYLPHENOL] | |
| 003697-24-3 | 5-METHYL CHRYSENE | > 0 but < 2.5 tpy |
| 000083-32-9 | ACENAPHTHENE | > 0 but < 10 tpy |
| 000075-07-0 | ACETALDEHYDE | >= 10 tpy |
| 000108-05-4 | ACETIC ACID ETHENYL ESTER | > 0 but < 10 tpy |
| 000075-05-8 | ACETONITRILE | >= 10 tpy |
| 000107-02-8 | ACROLEIN | >= 10 tpy |
| 069418-26-4 | ACRYL-(2-ACRYLOXYETHYL)TRIMETHYLAMMONIUM CHLORIDE COPOLMER | >= 250 tpy but < 75,000 tpy |
| 000532-27-4 | ALPHA-CHLOROACETOPHENONE | > 0 but < 10 tpy |
| 000062-53-3 | ANILINE | > 0 but < 10 tpy |
| 000120-12-7 | ANTHRACENE | > 0 but < 10 tpy |
| 007440-36-0 | ANTIMONY | >= 10 tpy |
| 007440-38-2 | ARSENIC | >= 10 tpy |
| 007440-39-3 | BARIUM | > 0 but < 2.5 tpy |
| 000121-69-7 | BENZENAMINE, N, N-DIMETHYL | > 0 but < 10 tpy |
| 000071-43-2 | BENZENE | >= 10 tpy |
| 000098-82-8 | BENZENE, (1-METHYLETHYL) | > 0 but < 10 tpy |
| 000095-47-6 | BENZENE,1,2-DIMETHYL | > 0 but < 10 tpy |
| 000056-55-3 | BENZO(A)ANTHRACENE | > 0 but < 10 tpy |
| 000050-32-8 | BENZO(A)PYRENE | >= 10 tpy |
| 000205-99-2 | BENZO[B]FLUORANTHENE | > 0 but < 10 tpy |
| 000100-44-7 | BENZYL CHLORIDE | >= 10 tpy |
| 007440-41-7 | BERYLLIUM | >= 10 tpy |
| 000117-81-7 | BIS(2-ETHYLHEXYL) PHTHALATE | >= 10 tpy |
| 000075-25-2 | BROMOFORM | >= 10 tpy |
| 000106-97-8 | BUTANE | > 0 but < 2.5 tpy |
| 000071-36-3 | BUTANOL | >= 50 tpy but < 100 tpy |
| 007440-43-9 | CADMIUM | >= 10 tpy |
| 000124-38-9 | CARBON DIOXIDE | >= 250 tpy but < 75,000 tpy |
| 000075-15-0 | CARBON DISULFIDE | >= 10 tpy |
| 000630-08-0 | CARBON MONOXIDE | >= 250 tpy but < 75,000 tpy |
| 007782-50-5 | CHLORINE | > 0 but < 10 tpy |
| 007791-21-1 | CHLORINE OXIDE CL2O | >= 50 tpy but < 100 tpy |
| 000108-90-7 | CHLOROBENZENE | >= 10 tpy |
| 007440-47-3 | CHROMIUM | >= 10 tpy |
| 018540-29-9 | CHROMIUM(VI) | >= 10 tpy |
| 000218-01-9 | CHRYSENE | > 0 but < 10 tpy |
| 007440-48-4 | COBALT | >= 10 tpy |
| 007440-50-8 | COPPER | > 0 but < 2.5 tpy |
| 001319-77-3 | CRESYLIC ACID | > 0 but < 10 tpy |
| 000057-12-5 | CYANIDE | >= 10 tpy |
| 000108-91-8 | CYCLOHEXANAMINE | >= 2.5 tpy but < 10 tpy |
| 000110-82-7 | CYCLOHEXANE | >= 250 tpy but < 75,000 tpy |
| 000053-70-3 | DIBENZ[A,H]ANTHRACENE | > 0 but < 10 tpy |
| 000132-64-9 | DIBENZOFURAN | > 0 but < 10 tpy |
| 025321-22-6 | DICHLOROBENZENE | > 0 but < 2.5 tpy |
| 000075-09-2 | DICHLOROMETHANE | >= 10 tpy |
| 000120-83-2 | DICHLOROPHENOL, 2,4 | > 0 but < 2.5 tpy |
| 000067-64-1 | DIMETHYL KETONE | >= 250 tpy but < 75,000 tpy |
| 000120-61-6 | DIMETHYLTEREPHTHALATE | > 0 but < 2.5 tpy |
| 064742-47-8 | DISTILLATES (PETROLEUM), HYDROTREATED LIGHT | >= 250 tpy but < 75,000 tpy |
| 000074-84-0 | ETHANE | > 0 but < 2.5 tpy |
| 000071-55-6 | ETHANE, 1,1,1-TRICHLORO | >= 10 tpy |

| | | |
|---|---|---|
| 000079-00-5 | ETHANE, 1,1,2-TRICHLORO | >= 10 tpy |
| 000111-44-4 | ETHANE, 1,1'-OXYBIS 2-CHLORO | > 0 but < 10 tpy |
| 000106-93-4 | ETHANE, 1,2-DIBROMO | > 0 but < 10 tpy |
| 000075-00-3 | ETHANE, CHLORO | >= 10 tpy |
| 000110-80-5 | ETHANOL, 2-ETHOXY- | > 0 but < 10 tpy |
| 000122-99-6 | ETHANOL, 2-PHENOXY | > 0 but < 10 tpy |
| 000540-59-0 | ETHENE, 1,2-DICHLORO | > 0 but < 2.5 tpy |
| 000075-35-4 | ETHENE,1,1-DICHLORO | >= 10 tpy |
| 000141-78-6 | ETHYL ACETATE | >= 250 tpy but < 75,000 tpy |
| 000064-17-5 | ETHYL ALCOHOL (ETHANOL) | >= 100 tpy but < 250 tpy |
| 000100-41-4 | ETHYLBENZENE | >= 10 tpy |
| 000079-06-1 | ETHYLENE CARBOXAMIDE | > 0 but < 10 tpy |
| 000206-44-0 | FLUORANTHENE | > 0 but < 10 tpy |
| 000086-73-7 | FLUORENE | > 0 but < 10 tpy |
| 016984-48-8 | FLUORIDE | > 0 but < 2.5 tpy |
| 000050-00-0 | FORMALDEHYDE | >= 10 tpy |
| 000064-18-6 | FORMIC ACID | > 0 but < 2.5 tpy |
| 068606-21-3 | GLYCOLS, C10-16 | >= 2.5 tpy but < 10 tpy |
| 000110-54-3 | HEXANE | >= 10 tpy |
| 000302-01-2 | HYDRAZINE | > 0 but < 10 tpy |
| 007647-01-0 | HYDROGEN CHLORIDE | >= 10 tpy |
| 007664-39-3 | HYDROGEN FLUORIDE | >= 10 tpy |
| 007783-06-4 | HYDROGEN SULFIDE | >= 100 tpy but < 250 tpy |
| 007790-92-3 | HYPOCHLOROUS ACID CLHO | >= 50 tpy but < 100 tpy |
| 000193-39-5 | INDENO[1,2,3-CD]PYRENE | > 0 but < 10 tpy |
| 000078-83-1 | ISOBUTYL ALCOHOL | >= 250 tpy but < 75,000 tpy |
| 000067-63-0 | ISOPROPYL ALCOHOL | >= 250 tpy but < 75,000 tpy |
| 000108-20-3 | ISOPROPYL ETHER | > 0 but < 2.5 tpy |
| 007439-92-1 | LEAD | >= 10 tpy |
| 007439-95-4 | MAGNESIUM | >= 250 tpy but < 75,000 tpy |
| 007439-96-5 | MANGANESE | >= 10 tpy |
| 000149-30-4 | MERCAPTOBENZOTHIAZOLE, 2- | > 0 but < 2.5 tpy |
| 007439-97-6 | MERCURY | >= 10 tpy |
| 000074-82-8 | METHANE | >= 250 tpy but < 75,000 tpy |
| 000080-62-6 | METHYL ACRYLIC ACIDMETHYL ESTER | >= 10 tpy |
| 000067-56-1 | METHYL ALCOHOL | >= 10 tpy |
| 000074-87-3 | METHYL CHLORIDE | >= 10 tpy |
| 000078-93-3 | METHYL ETHYL KETONE | >= 250 tpy but < 75,000 tpy |
| 000060-34-4 | METHYL HYDRAZINE | >= 10 tpy |
| 001634-04-4 | METHYL TERTBUTYL ETHER | >= 10 tpy |
| 000057-55-6 | METHYLETHYL GLYCOL | > 0 but < 2.5 tpy |
| 007439-98-7 | MOLYBDENUM | > 0 but < 2.5 tpy |
| 000121-44-8 | N,N-DIETHYL ETHANAMINE | > 0 but < 10 tpy |
| 000091-20-3 | NAPHTHALENE | >= 10 tpy |
| 000142-82-5 | N-HEPTANE | >= 250 tpy but < 75,000 tpy |
| 007440-02-0 | NICKEL METAL AND INSOLUBLE COMPOUNDS | >= 10 tpy |
| 010024-97-2 | NITROUS OXIDE | >= 250 tpy but < 75,000 tpy |
| 0NY210-00-0 | OXIDES OF NITROGEN | >= 250 tpy but < 75,000 tpy |
| 000106-89-8 | OXIRANE, (CHLOROMETHYL) | > 0 but < 10 tpy |
| 0NY075-00-0 | PARTICULATES | >= 250 tpy but < 75,000 tpy |
| 000109-66-0 | PENTANE | > 0 but < 2.5 tpy |
| 000127-18-4 | PERCHLOROETHYLENE | >= 10 tpy |
| 000085-01-8 | PHENANTHRENE | > 0 but < 10 tpy |
| 000108-95-2 | PHENOL | >= 10 tpy |
| 000080-46-6 | PHENOL, 4-(1,1-DIMETHYLPROPYL)- | > 0 but < 2.5 tpy |

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|---|---|---|
| 000115-86-6 | PHOSPHORIC ACID TRIPHENYL ESTER C18H15O4P | > 0 but < 2.5 tpy |
| 007723-14-0 | PHOSPHORUS (YELLOW) | > 0 but < 10 tpy |
| 0NY075-02-5 | PM 2.5 | >= 100 tpy but < 250 tpy |
| 0NY075-00-5 | PM-10 | >= 250 tpy but < 75,000 tpy |
| 000074-98-6 | PROPANE | > 0 but < 2.5 tpy |
| 000078-87-5 | PROPANE, 1,2-DICHLORO | >= 10 tpy |
| 000107-13-1 | PROPENENITRILE | > 0 but < 10 tpy |
| 000123-38-6 | PROPIONALDEHYDE | >= 10 tpy |
| 000129-00-0 | PYRENE | > 0 but < 10 tpy |
| 000110-86-1 | PYRIDINE | >= 10 tpy but < 25 tpy |
| 007782-49-2 | SELENIUM | >= 10 tpy |
| 007440-22-4 | SILVER | >= 25 tpy but < 40 tpy |
| 000100-42-5 | STYRENE | >= 10 tpy |
| 007446-09-5 | SULFUR DIOXIDE | >= 250 tpy but < 75,000 tpy |
| 007664-93-9 | SULFURIC ACID | >= 100 tpy but < 250 tpy |
| 000077-78-1 | SULFURIC ACID, DIMETHYL ESTER | >= 10 tpy |
| 000109-99-9 | TETRAHYDROFURAN | >= 250 tpy but < 75,000 tpy |
| 007440-28-0 | THALLIUM | > 0 but < 2.5 tpy |
| 000108-88-3 | TOLUENE | >= 10 tpy |
| 0NY100-00-0 | TOTAL HAP | >= 100 tpy but < 250 tpy |
| 000079-01-6 | TRICHLOROETHYLENE | > 0 but < 10 tpy |
| 007440-62-2 | VANADIUM | >= 250 tpy but < 75,000 tpy |
| 000075-01-4 | VINYL CHLORIDE | > 0 but < 10 tpy |
| 0NY998-00-0 | VOC | >= 250 tpy but < 75,000 tpy |
| 001330-20-7 | XYLENE, M, O & P MIXT. | >= 10 tpy |
| 007440-66-6 | ZINC | > 0 but < 2.5 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;
(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 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 2 01-6.7 and Part 621.

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

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

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

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

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

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

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, 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 | 274 | Powers and Duties of the Department with respect to air pollution control |
| U-00015 | 40CFR 52-A.21 | 147, 148 | Prevention of Significant Deterioration |
| U-00015/-/K14 | 40CFR 52-A.21 | 212 | Prevention of Significant Deterioration |
| U-00051/32102/K18/32111 | 40CFR 52-A.21 | 269 | Prevention of Significant Deterioration |
| U-00015 | 40CFR 60-A | 149 | General provisions |
| U-00015 | 40CFR 60-Db.42b(k)(2) | 150 | February 28, 2005 Percent Sulfur/Sulfur Dioxide Standard |
| U-00015 | 40CFR 60-Db.43b(h)(5) | 151 | Exemption from PM and Opacity Standards |
| U-00015/-/K22 | 40CFR 60-Db.46b(f) | 224 | Compliance and Performance Test Methods and Procedures for Particulate Matter and and Nitrogen Oxides. |
| U-00015 | 40CFR 60-Db.48b(j) | 152 | Exemption from Emissions Monitoring |
| U-00015 | 40CFR 60-Db.49b(d) | 153 | Reporting and Recordkeeping Requirements. |
| U-00015 | 40CFR 60-Db.49b(g) | 154 | Reporting and Recordkeeping Requirements. |
| U-00015 | 40CFR 60-Db.49b(h) | 155 | Reporting and Recordkeeping Requirements. |
| U-00008/-/K02 | 40CFR 61-A | 47 | General Provisions - applicability of part 61 |
| FACILITY | 40CFR 61-FF.342(a) | 28 | Benzene Emissions from Benzene waste operations - standards: general |
| FACILITY | 40CFR 61-FF.356(a) | 29 | Benzene Emissions from Benzene waste operations - recordkeeping requirements |
| FACILITY | 40CFR 61-FF.356(b)(1) | 30 | Benzene Emissions from Benzene waste operations - recordkeeping requirements |
| FACILITY | 40CFR 61-FF.357(a) | 31 | Benzene Emissions from Benzene waste operations - reporting reqts |
| FACILITY | 40CFR 61-FF.357(b) | 32 | Benzene Emissions from Benzene waste |

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| | | | operations - reporting reqts |
| FACILITY | 40CFR 61-M | 27 | Asbestos standards for: asbestos mills, manufacturing operations using asbestos, and other sources |
| FACILITY | 40CFR 63-A.6(i)(4)(i)(' | 33 | |
| U-00008 | 40CFR 63-DD.680(f) | 44, 45 | NESHAP for Offsite Waste and Recovery Operations - general provisions applicability |
| U-00008 | 40CFR 63-DD.683(b)(2)(i | 46 | NESHAP for Offsite Waste and Recovery Operations - General Standards |
| U-00015 | 40CFR 63-DDDDD.7495(a) | 156 | ICI Boiler Major Source NESHAP - Compliance Date for New Sources |
| U-00015 | 40CFR 63-DDDDD.7495(b) | 157 | ICI Boiler Major Source NESHAP - Compliance Date for Existing Sources |
| U-00015 | 40CFR 63-DDDDD.7500(a)( | 158, 159, 160 | ICI Boiler Major Source NESHAP - Emission Limits and Management Practices |
| U-00015/-/K14 | 40CFR 63-DDDDD.7500(a)( | 213, 214, 215, 216 | ICI Boiler Major Source NESHAP - Emission Limits and Management Practices |
| U-00015/-/K16 | 40CFR 63-DDDDD.7500(a)( | 219, 220, 221, 222 | ICI Boiler Major Source NESHAP - Emission Limits and Management Practices |
| U-00015/-/K16/321AJ | 40CFR 63-DDDDD.7500(a)( | 223 | ICI Boiler Major Source NESHAP - Emission Limits and Management Practices |
| U-00015/-/K23 | 40CFR 63-DDDDD.7500(a)( | 226, 227, 228, 229, 230, 231, 232 | ICI Boiler Major Source NESHAP - Emission Limits and Management Practices |
| U-00015 | 40CFR 63-DDDDD.7500(a)( | 161, 162, 163 | ICI Boiler Major Source NESHAP - Operating Limits |
| U-00015/-/K23 | 40CFR 63-DDDDD.7500(a)( | 233 | ICI Boiler Major Source NESHAP - Operating Limits |
| U-00015 | 40CFR 63-DDDDD.7500(a)( | 164 | ICI Boiler Major Source NESHAP - Good Air Pollution Control Practices |
| U-00015/-/K23 | 40CFR 63-DDDDD.7500(a)( | 234 | ICI Boiler Major Source NESHAP - Good Air Pollution Control Practices |
| U-00015 | 40CFR 63-DDDDD.7500(c) | 165 | ICI Boiler Major Source NESHAP - Limited-Use Boilers and Process Heaters |

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| U-00015 | 40CFR 63-DDDDD.7501(a) | 166 | ICI Boiler Major Source NESHAP - Affirmative Defense |
| U-00015/-/K23 | 40CFR 63-DDDDD.7501(a) | 235 | ICI Boiler Major Source NESHAP - Affirmative Defense |
| U-00015 | 40CFR 63-DDDDD.7501(b) | 167 | ICI Boiler Major Source NESHAP - Reporting of Affirmative Defense |
| U-00015/-/K23 | 40CFR 63-DDDDD.7501(b) | 236 | ICI Boiler Major Source NESHAP - Reporting of Affirmative Defense |
| U-00015 | 40CFR 63-DDDDD.7505(c) | 168 | ICI Boiler Major Source NESHAP - Demonstrating Compliance |
| U-00015/-/K23 | 40CFR 63-DDDDD.7505(c) | 237 | ICI Boiler Major Source NESHAP - Demonstrating Compliance |
| U-00015 | 40CFR 63-DDDDD.7505(d) | 169 | ICI Boiler Major Source NESHAP - Site-Specific Monitoring Plan |
| U-00015/-/K23 | 40CFR 63-DDDDD.7505(d) | 238 | ICI Boiler Major Source NESHAP - Site-Specific Monitoring Plan |
| U-00015 | 40CFR 63-DDDDD.7510(e) | 170 | ICI Boiler Major Source NESHAP - Initial Compliance Date for Existing Sources |
| U-00015 | 40CFR 63-DDDDD.7510(g) | 171 | ICI Boiler Major Source NESHAP - Initial Compliance Date for New Sources Subject to Work Practices |
| U-00015 | 40CFR 63-DDDDD.7510(j) | 172 | ICI Boiler Major Source NESHAP - Initial Compliance for Boilers not in Operation |
| U-00015/-/K14 | 40CFR 63-DDDDD.7515(e) | 217 | ICI Boiler Major Source NESHAP - Compliance with Fuel Analysis |
| U-00015/-/K23 | 40CFR 63-DDDDD.7515(e) | 239 | ICI Boiler Major Source NESHAP - Compliance with Fuel Analysis |
| U-00015/-/K14 | 40CFR 63-DDDDD.7515(h) | 218 | ICI Boiler Major Source NESHAP - Ultra Low Sulfur Liquid Fuel |
| U-00015/-/K23 | 40CFR 63-DDDDD.7515(h) | 240 | ICI Boiler Major Source NESHAP - Ultra Low Sulfur Liquid Fuel |
| U-00015 | 40CFR 63-DDDDD.7520 | 173 | ICI Boiler Major Source NESHAP - Stack Test Requirements |

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| U-00015/-/K23 | 40CFR 63-DDDDD.7520 | 241 | ICI Boiler Major Source NESHAP - Stack Test Requirements |
| U-00015 | 40CFR 63-DDDDD.7521(a) | 174 | ICI Boiler Major Source NESHAP - Fuel Analysis Requirements |
| U-00015/-/K23 | 40CFR 63-DDDDD.7521(a) | 242 | ICI Boiler Major Source NESHAP - Fuel Analysis Requirements |
| U-00015 | 40CFR 63-DDDDD.7525(a) | 175 | ICI Boiler Major Source NESHAP - Oxygen Monitoring Requirements |
| U-00015/-/K23 | 40CFR 63-DDDDD.7525(a) | 243 | ICI Boiler Major Source NESHAP - Oxygen Monitoring Requirements |
| U-00015 | 40CFR 63-DDDDD.7525(f) | 176 | ICI Boiler Major Source NESHAP - Pressure Monitoring System |
| U-00015 | 40CFR 63-DDDDD.7525(k) | 177 | ICI Boiler Major Source NESHAP - Limited-use |
| U-00015 | 40CFR 63-DDDDD.7530(a) | 178 | ICI Boiler Major Source NESHAP - Initial Compliance Demonstration |
| U-00015/-/K23 | 40CFR 63-DDDDD.7530(a) | 244 | ICI Boiler Major Source NESHAP - Initial Compliance Demonstration |
| U-00015 | 40CFR 63-DDDDD.7530(b) | 179 | ICI Boiler Major Source NESHAP - Initial Compliance Demonstration Through Performance Testing |
| U-00015/-/K23 | 40CFR 63-DDDDD.7530(b) | 245 | ICI Boiler Major Source NESHAP - Initial Compliance Demonstration Through Performance Testing |
| U-00015 | 40CFR 63-DDDDD.7530(c) | 180 | ICI Boiler Major Source NESHAP - Initial Compliance Demonstration Through Fuel Analysis |
| U-00015/-/K23 | 40CFR 63-DDDDD.7530(c) | 246 | ICI Boiler Major Source NESHAP - Initial Compliance Demonstration Through Fuel Analysis |
| U-00015/-/K24 | 40CFR 63-DDDDD.7530(d) | 265 | Boiler MACT - Tune up certification, small units and gas 1 units |
| U-00015 | 40CFR 63-DDDDD.7530(e) | 181 | ICI Boiler Major Source NESHAP - Certification of Energy Assessment |
| U-00015 | 40CFR 63-DDDDD.7530(h) | 182 | ICI Boiler Major Source NESHAP - Work Practice Standards |
| U-00015/-/K23 | 40CFR 63-DDDDD.7530(h) | 247 | ICI Boiler Major Source NESHAP - Work Practice Standards |

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| U-00015 | 40CFR 63-DDDDD.7535 | 183 | ICI Boiler Major Source NESHAP - Minimum monitoring data collection |
| U-00015/-/K23 | 40CFR 63-DDDDD.7535 | 248 | ICI Boiler Major Source NESHAP - Minimum monitoring data collection |
| U-00015 | 40CFR 63-DDDDD.7540(a) | 184 | ICI Boiler Major Source NESHAP - Continuous Compliance |
| U-00015/-/K23 | 40CFR 63-DDDDD.7540(a) | 249 | ICI Boiler Major Source NESHAP - Continuous Compliance |
| U-00015 | 40CFR 63-DDDDD.7545(c) | 185 | ICI Boiler Major Source NESHAP - New Source Notification |
| U-00015 | 40CFR 63-DDDDD.7545(d) | 186 | ICI Boiler Major Source NESHAP - Performance Test Notification |
| U-00015/-/K23 | 40CFR 63-DDDDD.7545(d) | 250 | ICI Boiler Major Source NESHAP - Performance Test Notification |
| U-00015 | 40CFR 63-DDDDD.7545(e) | 187 | ICI Boiler Major Source NESHAP - Notification of Compliance Status |
| U-00015/-/K23 | 40CFR 63-DDDDD.7545(e) | 251 | ICI Boiler Major Source NESHAP - Notification of Compliance Status |
| U-00015 | 40CFR 63-DDDDD.7550(b) | 188 | ICI Boiler Major Source NESHAP - Reporting Requirements |
| U-00015/-/K23 | 40CFR 63-DDDDD.7550(b) | 252 | ICI Boiler Major Source NESHAP - Reporting Requirements |
| U-00015 | 40CFR 63-DDDDD.7550(c) | 189 | ICI Boiler Major Source NESHAP - Compliance Reports |
| U-00015/-/K23 | 40CFR 63-DDDDD.7550(c) | 253 | ICI Boiler Major Source NESHAP - Compliance Reports |
| U-00015 | 40CFR 63-DDDDD.7550(d) | 190 | ICI Boiler Major Source NESHAP - Deviation Reporting at Facilities not Using CMS |
| U-00015/-/K23 | 40CFR 63-DDDDD.7550(d) | 254 | ICI Boiler Major Source NESHAP - Deviation Reporting at Facilities not Using CMS |
| U-00015 | 40CFR 63-DDDDD.7550(e) | 191 | ICI Boiler Major Source NESHAP - Deviation Reporting at Facilities Using CMS |
| U-00015/-/K23 | 40CFR 63-DDDDD.7550(e) | 255 | ICI Boiler Major Source NESHAP - Deviation Reporting |

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| | | | at Facilities Using CMS |
| U-00015 | 40CFR 63-DDDDD.7550(h) | 192 | ICI Boiler Major Source NESHAP - Performance tests and CEMS reporting |
| U-00015/-/K23 | 40CFR 63-DDDDD.7550(h) | 256 | ICI Boiler Major Source NESHAP - Performance tests and CEMS reporting |
| U-00015 | 40CFR 63-DDDDD.7555(a) | 193 | ICI Boiler Major Source NESHAP - Recordkeeping |
| U-00015/-/K23 | 40CFR 63-DDDDD.7555(a) | 257 | ICI Boiler Major Source NESHAP - Recordkeeping |
| U-00015 | 40CFR 63-DDDDD.7555(b) | 194 | ICI Boiler Major Source NESHAP - Continuous Monitoring System Recordkeeping |
| U-00015/-/K23 | 40CFR 63-DDDDD.7555(b) | 258 | ICI Boiler Major Source NESHAP - Continuous Monitoring System Recordkeeping |
| U-00015 | 40CFR 63-DDDDD.7555(c) | 195 | ICI Boiler Major Source NESHAP - Monitoring Data Recordkeeping |
| U-00015/-/K23 | 40CFR 63-DDDDD.7555(c) | 259 | ICI Boiler Major Source NESHAP - Monitoring Data Recordkeeping |
| U-00015 | 40CFR 63-DDDDD.7555(d) | 196 | ICI Boiler Major Source NESHAP - Recordkeeping for Units Subject to Emission Limits |
| U-00015/-/K23 | 40CFR 63-DDDDD.7555(d) | 260 | ICI Boiler Major Source NESHAP - Recordkeeping for Units Subject to Emission Limits |
| U-00015 | 40CFR 63-DDDDD.7555(i) | 197 | ICI Boiler Major Source NESHAP - Startup and Shutdown Records |
| U-00015/-/K23 | 40CFR 63-DDDDD.7555(i) | 261 | ICI Boiler Major Source NESHAP - Startup and Shutdown Records |
| U-00015 | 40CFR 63-DDDDD.7555(j) | 198 | ICI Boiler Major Source NESHAP - Startup and Shutdown Fuel Records |
| U-00015/-/K23 | 40CFR 63-DDDDD.7555(j) | 262 | ICI Boiler Major Source NESHAP - Startup and Shutdown Fuel Records |
| U-00015 | 40CFR 63-DDDDD.7560 | 199 | ICI Boiler Major Source NESHAP - Record Format |
| U-00015/-/K23 | 40CFR 63-DDDDD.7560 | 263 | ICI Boiler Major Source NESHAP - Record Format |
| U-00015 | 40CFR 63-DDDDD.7565 | 200 | ICI Boiler Major |

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| | | | Source NESHAP - General Provisions |
| U-00015/-/K23 | 40CFR 63-DDDDD.7565 | 264 | ICI Boiler Major Source NESHAP - General Provisions |
| U-00008/-/K02 | 40CFR 63-EEE.1200(c) | 48 | Hazardous Waste Combustors - General Provisions |
| U-00008/09503 | 40CFR 63-EEE.1206(c) | 58 | Operating requirements |
| U-00008/09503 | 40CFR 63-EEE.1206(c)(2) | 59 | Hazardous Waste Combustor NESHAP - Startup/Shutdown/Malfunction Plan |
| U-00008/-/K02 | 40CFR 63-EEE.1206(c)(3) | 49 | Hazardous Waste Combustor NESHAP - Automatic Waste Feed Cutoff (AWFCO) requirements |
| U-00008/09503 | 40CFR 63-EEE.1206(c)(3) | 60, 61, 62 | Hazardous Waste Combustor NESHAP - Automatic Waste Feed Cutoff (AWFCO) requirements |
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| U-00008/09503 | 40CFR 63-EEE.1206(c)(6) | 68, 69, 70, 71 | Hazardous Waste Combustor NESHAP - Operator training and certification |
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| FACILITY | 6NYCRR 201-6.4(a)(7) | 2 | General Conditions - Fees |
| FACILITY | 6NYCRR 201-6.4(a)(8) | 16 | General Conditions - Right to Inspect |
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| U-00015/-/K25 | 6NYCRR 229.5(d) | 266 | Recordkeeping - VOL storage tanks |
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| U-00015/-/K13/321AI | 6NYCRR 231-10 | 211 | Emission Reduction Credits (ERCs) |
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| U-00015 | 6NYCRR 249 | 285 | electrical output to the grid restricted by permit conditions Best Available Retrofit Technology |

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

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

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)
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 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, RED-ROCHESTER LLC AT EASTMAN BUSINESS PARK has been determined to be subject to the following regulations:
40 CFR 52.21
This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions;
ie: facilities that are located in an attainment area and that emit pollutants which are listed in

40 CFR 52.21(b)(23)(i) .

40 CFR 60.42b (k) (2)
Percent sulfur-in-fuel/sulfur dioxide standards for coal and oil fired boilers, located in noncontinental areas, constructed or modified on or after February 28, 2005.

40 CFR 60.43b (h) (5)
This citation provides an exemption from PM and opacity requirements for oil only fired boilers that combust oil with a sulfur content of 0.3% by weight or less.

40 CFR 60.46b (f)
This condition states the requirements for compliance demonstrations for NOx standards.

40 CFR 60.48b (j)
This citations allows the use of vender fuel certifications instead of emissions monitoring for PM.

40 CFR 60.49b (d)
This subdivision requires reporting and recordkeeping for affected steam generating units - annual fuel capacity factors.

40 CFR 60.49b (g)
This subdivision requires reporting and recordkeeping for affected steam generating units - specific oxides of nitrogen requirements.

40 CFR 60.49b (h)
This subdivision specifies that the facility must submit excess emission reports.

40 CFR 61.342 (a)
Conditions under this rule outline the requirements for chemical manufacturing plants, coke byproduct recovery plants and petroleum refineries to show that they manage less than 10 megagrams per year of benzene from facility waste. Staying below this threshold exempts the plant from the substantive requirements of the Benzene Recovery NESHAP.

40 CFR 61.356 (a)
This regulation requires the owner or operator to comply with the recordkeeping requirements of 40 CFR 61.356. Each record must be maintained in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified

40 CFR 61.356 (b) (1)
This regulation requires the owner or operator to maintain records that identify each waste stream at the facility subject to 40 CFR 61 Subpart FF, and indicate whether or not the waste stream is controlled for

benzene emissions in accordance with this subpart.

40 CFR 61.357 (a)
This regulation requires each owner or operator of a chemical plant, petroleum refinery, coke by-product recovery plant, and any facility managing wastes from these industries to submit to the EPA a report that summarizes the regulatory status of each waste stream subject to Sec. 61.342 and is determined by the procedures specified in 40 CFR 61.355(c) to contain benzene.

40 CFR 61.357 (b)
If the total annual benzene quantity from the facility is less than 1 Mg/yr, this regulation requires the owner or operator to submit to the DEC and/or EPA a report that updates the information listed in paragraphs (a)(1) through (a)(3) of 40 CFR 61.357 whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr or more.

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

40 CFR 63.1206 (c)
Summary of Operating requirements --
(1) General.
(2) Startup, shutdown, and malfunction plan.
(3) Automatic waste feed cutoff
(4) ESV openings
(5) Combustion System Leaks
(6) Operator training and certification.
(7) Operation and maintenance plan

40 CFR 63.1206 (c) (2)
This condition reduces the emissions of hazardous air pollutants (HAPs) by requiring the facility to come up with a way to reduce emissions when they are starting up or shutting down the combustor and related equipment, or when the equipment malfunctions. This condition requires the facility to develop a plan for dealing with these situations and minimizing the amount of toxic chemicals that get released to the atmosphere at these times.

40 CFR 63.1206 (c) (3)
This condition reduces the emissions of hazardous air pollutants (HAPs) by requiring the facility to implement an automatic shut-off system that will shut down the equipment that feeds hazardous waste into the incinerator. This will be done whenever any monitored value exceeds the emission standard set in this air permit.

40 CFR 63.1206 (c) (4)
This condition reduces the emissions of hazardous air pollutants (HAPs) by requiring the facility to implement ways to reduce HAP emissions when emergency safety vents (ESVs) are opened. The facility

must develop and implement a plan to deal with ESV openings and try to correct the cause of the opening as fast as possible.

40 CFR 63.1206 (c) (5)
This condition requires the facility to reduce leaks of hazardous air pollutants (HAPs) by taking steps to reduce the leaking of HAPs in the combustion chamber.

40 CFR 63.1206 (c) (6)
This condition requires the facility to train their employees in order that they can operate the hazardous waste combustion system so that releases of hazardous air pollutants are minimized. This condition requires certain personnel to be certified and can operate the combustion system in an efficient manner to reduce HAP emissions.

40 CFR 63.1206 (c) (7)
These conditions requires the facility to reduce hazardous air pollutant (HAP) emissions by creating and following an operation and maintenance plan (O&M plan) to run the hazardous waste combustion system in an efficient manner.

40 CFR 63.1207
This citation specifies the performance testing requirements as follows:
(a) General.
(b) Types of performance tests
(c) Initial comprehensive performance test
(d) Frequency of testing.
(e) Notification of performance test and CMS performance evaluation, and approval of test plan and CMS performance evaluation plan.
(f) Content of performance test plan.
(g) Operating conditions during testing.
(h) Operating conditions during subsequent testing.
(i) Time extension for subsequent performance tests.
(j) Notification of Compliance
(k) Failure to submit a timely notification of compliance.
(l) Failure of performance test
(m) Waiver of Performance Test
(n) Feedrate limits for nondetectable constituents.

40 CFR 63.1207 (j) (1)
This condition requires the facility to report to the NYSDEC whether the comprehensive performance test they performed showed that the facility met the emission standards in the hazardous waste combustor NESHAP rule. The report shall also have the operating parameter limits listed which will prove that the facility will continuously be in compliance until the next confirmatory performance test.

40 CFR 63.1207 (j) (2)
This condition requires the facility to report the results of the confirmatory performance test which will prove whether the hazardous waste combustor at the facility still meets the emission standards in the hazardous waste combustor NESHAP rule.

40 CFR 63.1207 (l)
This condition details steps that the facility must undertake if a performance test shows that the hazardous waste combustor does not meet the emission standards contained in the hazardous waste combustor NESHAP.

40 CFR 63.1209 (a) (6)
This condition specifies how the facility will calculate the averages from the readings on its continuous emission monitors. This calculation will be compared to the emission limits to determine whether the facility is in compliance with the hazardous waste combustor NESHAP.

40 CFR 63.1209 (b)
(b) Other continuous monitoring systems (CMS).
(1) You must use CMS (e.g., thermocouples, pressure transducers, flow meters) to document compliance with the applicable operating parameter limits under this section.
(2) Except as specified in paragraphs (b)(2)(i) and (ii) of this section, you must install and operate continuous monitoring systems other than CEMS in conformance with § 63.8(c)(3) that requires you, at a minimum, to comply with the manufacturer's written specifications or recommendations for
installation, operation, and calibration of the system:
(i) Calibration of thermocouples. The calibration of a thermocouple or other temperature sensor must be verified at least once every three months; and
(ii) Accuracy and calibration of weight measurement devices. The accuracy of weight measurement devices used to monitor flowrate of a feedstream (e.g., activated carbon feedrate, sorbent feedrate, nonpumpable waste) must be ± 1 percent of the weight being measured. The calibration of the device must be verified at least once every three months.
(3) CMS must sample the regulated parameter without interruption, and evaluate the detector response at least once each 15 seconds, and compute and record the average values at least every 60 seconds.
(4) The span of the non-CEMS CMS detector must not be exceeded. You must interlock the span limits into the automatic waste feed cutoff system required by § 63.1206(c)(3).
(5) Calculation of rolling averages -- (i) Calculation of rolling averages initially. Continuous monitoring systems must begin recording one-minute average values by 12:01 a.m., hourly rolling average values by 1:01 a.m.(e.g., when 60 one-minute values will be available for calculating the initial hourly rolling average), and twelve-hour rolling averages by 12:01 p.m.(e.g., when 720 one-minute averages are available to calculate a 12-hour rolling average), for those sources that come into compliance on the regulatory compliance date. Sources that elect to come into compliance before the regulatory compliance date must begin recording one-minute, hourly rolling average, and 12-hour rolling average values within 60 seconds, 60 minutes (when 60 one-minute values will be available for calculating the initial hourly rolling average), and 720 minutes (when 720 one-minute values will be available for calculating the initial 12-hour hourly rolling average) respectively, from the time at which compliance begins.
(ii) Calculation of rolling averages upon intermittent operations. You must ignore periods of time when one-minute values are not available for calculating rolling averages. When one-minute values

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

40 CFR 63.1209 (b) (5)
This condition details how the facility shall calculate the hourly rolling averages to determine whether the parameter limits are being met continuously.

40 CFR 63.1209 (c) (2)
This condition requires the facility to develop a feedstream analysis plan in order to determine whether the properties of the feedstream meet the operating limits in this subpart. This analysis should include information on what the facility will measure, and how the parameter will be measured. The plan will be recorded in the facility's operating record.

40 CFR 63.1209 (g) (2)

40 CFR 63.1209 (k) (2)
This condition requires that in order for the facility to determine if it is complying with the dioxin and furan emission standard, then a maximum flue gas flowrate or production rate must be established during the performance test.

40 CFR 63.1209 (k) (4)
This condition requires that in order for the facility to determine if it is complying with the dioxin and furan emission standard, then parameters must be established during the performance test which indicate proper operation of the waste firing system.

40 CFR 63.1209 (l) (1)
During the comprehensive performance test, the maximum level of mercury is established which will ensure that the hazardous waste combustor does not exceed the emission limit for mercury. The facility will then need to monitor the mercury content of the hazardous waste to prove that the limit has not been exceeded.

40 CFR 63.1209 (l) (2)
This condition requires the facility to establish operating limits for a wet scrubber in order to control the emissions of mercury to a level that complies with the mercury emission limit.

40 CFR 63.1209 (m) (1) (i) ('A')
If the facility equips the hazardous waste combustor with a high energy wet scrubber, then this condition

requires the facility to monitor certain parameters to make sure the scrubber is working properly to control hazardous air pollutant emissions. This condition specifically requires the facility to monitor the pressure drop across the scrubber.

40 CFR 63.1209 (m) (1) (i) ('B') ('1')
This regulation requires that the liquid level in the Entrainment Separator Sump (Control Device 09510) (Venturi/Separator Recycle Tank) be maintained at or above 33 inches on a rolling hourly basis. The liquid level shall be monitored on a continuous basis when wastewater, grit or debris is being incinerated

40 CFR 63.1209 (m) (1) (i) ('C')
If the facility equips the hazardous waste combustor with a high energy wet scrubber, then this condition requires the facility to monitor certain parameters to make sure the scrubber is working properly to control hazardous air pollutant emissions.

40 CFR 63.1209 (m) (3)
This regulation requires that the ash feed rate to the Multiple Hearth Incinerator (MHI) be limited to the rate that was demonstrated during the most recent compliance test. The ash feed rate shall be monitored on a continuous basis using data collected for the feed analysis plan and the continuous sludge feedrate measurement when wastewater, grit or debris is being incinerated.

40 CFR 63.1209 (n) (2)
This regulation requires that the feed rate of low-volatile metals to the Multiple Hearth Incinerator (MHI) be limited to a maximum rate that was demonstrated during the most recent compliance testing. The low-volatile metal feed rate shall be monitored on a continuous basis using data collected for the feed analysis plan and the continuous sludge feed rate measurement when wastewater, grit or debris is being incinerated

40 CFR 63.1209 (o) (1)
In order for the hazardous waste combustor to meet the emission limits for hydrochloric acid and chlorine gas, then during the comprehensive performance test the facility must establish operating limits that prove that the facility will be in compliance with the metal limits as long as the operating parameter is being met. This condition specifically requires the facility to set a limit for the maximum amount of chlorine and chloride in the hazardous waste feedstream.

40 CFR 63.1209 (o) (3) (ii)
This condition requires the facility to monitor certain parameters to make sure the wet scrubber is working properly to control hydrochloric acid and chloride gas emissions. This condition specifically requires the facility to monitor the pressure drop across the scrubber.

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

This condition requires the facility to monitor certain parameters to make sure the wet scrubber is working properly to control hydrochloric acid and chloride gas emissions. This condition specifically requires the facility to monitor the pH in the scrubber.

40 CFR 63.1209 (o) (3) (v)
This condition requires the facility to monitor certain parameters to make sure the wet scrubber is working properly to control hydrochloric acid and chloride gas emissions. This condition specifically requires the facility to monitor the minimum liquid-gas ratio or minimum scrubber water flowrate and maximum flue gas flowrate in the scrubber.

40 CFR 63.1211 (a)

40 CFR 63.1211 (b)
This condition lists the information that the facility must keep on record at the plant. This information will assist the NYSDEC when the facility is inspected in order to determine whether the plant has been in compliance with the emission standards listed in this subpart EEE. Information that must be recorded includes instrument readings which indicate whether any control devices were working, whether there were any startups, shutdowns, or malfunctions at the facility, and whether the plant has changed its operation in a way that could affect the emissions from the incinerator.

40 CFR 63.1219 (a)
This condition states the emission limit for dioxin from the unit is 0.20 nanograms of TEQ per dry standard cubic foot.

40 CFR 63.6 (i) (4) (i) ('A')
This condition explains the provisions by which EPA may grant a one year extension to the owner of an existing source to comply with a standard.

40 CFR 63.6665
This regulation specifies which provisions of the General provisions (Subpart A of 40 CFR 63) apply to the owner or operators of stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40 CFR 63.680 (f)
Facilities that are subject to Subpart DD are also subject to some of the general provisions listed in Subpart A of 40 CFR Part 63. This regulation lists these provisions.

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

This regulation requires the owner or operator of the facility to limit the concentration of volatile organic hazardous air pollutants (VOHAP) to 500 parts per million for each off-site waste stream placed in a unit with a process vent. The VOHAP concentration must be determined the first time the waste is placed in the unit and then annually thereafter.

40 CFR 63.7495 (a)
This condition states the date which a new affected source must achieve compliance.

40 CFR 63.7495 (b)
This regulation requires industrial, commercial or institutional boilers located at facilities that are major sources of hazardous air pollutants to comply with 40 CFR 63 Subpart DDDDD by January 31, 2016.

40 CFR 63.7500 (a) (1)
These conditions state what emission limits and management practices affected sources with which the owner or operator must comply.

40 CFR 63.7500 (a) (2)
These conditions state the operating limits owners or operators of industrial, commercial, or institutional boilers must follow.

40 CFR 63.7500 (a) (3)
This condition states that the owner or operator must operate and maintain the affected source consistent with good air control practices.

40 CFR 63.7500 (c)
This condition states the requirements for limited use boilers and process heaters.

40 CFR 63.7501 (a)
This condition states the procedure that an owner or operator of an industrial, commercial, or institutional boiler may use an affirmative defense of excess emissions.

40 CFR 63.7501 (b)
This condition states the reporting requirements for an owner or operator to assert an affirmative defense.

40 CFR 63.7505 (c)
This condition states that compliance must be demonstrated through performance tests, fuel analysis, or continuous monitoring system.

40 CFR 63.7505 (d)
This condition states that owners or operators of industrial, commercial, and institutional boilers who demonstrate compliance with any applicable emission limit through stack testing and subsequent compliance with operating limits must develop a site-specific monitoring plan.

40 CFR 63.7510 (e)
This condition states that the owner or operator must demonstrate initial compliance no later than 180 days after the compliance date.

40 CFR 63.7510 (g)
This condition states when the owner or operator of a new source subject to work practices for subpart DDDDD must demonstrate initial compliance.

40 CFR 63.7510 (j)
This condition states when the owner or operator of a source not in operation must demonstrate initial compliance.

40 CFR 63.7515 (e)
This condition states how the owner or operator complies with the fuel analysis requirements

40 CFR 63.7515 (h)
This condition states the testing requirements for boilers firing ultra low sulfur liquid fuel.

40 CFR 63.7520
This regulation sets forth the requirements for stack tests to be conducted on industrial, commercial and institutional boilers at facilities that emit hazardous air pollutants.

40 CFR 63.7521 (a)
This condition states the procedures used to conduct a fuel analysis.

40 CFR 63.7525 (a)
This regulation requires the installation of a continuous oxygen monitor at the outlet of the boiler.

40 CFR 63.7525 (f)
This condition states the requirements for pressure monitoring systems.

40 CFR 63.7525 (k)
This condition states that the owner or operator must monitor and record the operating hours for each limited-use boiler or process heater.

40 CFR 63.7530 (a)
This condition states the requirements for facilities to conduct initial compliance demonstrations, fuel analyses and establish operating limits to ensure continuous compliance.

40 CFR 63.7530 (b)
This condition specifies the operating limits to be established through initial performance testing and fuel analyses.

40 CFR 63.7530 (c)
This condition specifies how to conduct fuel analyses in order to demonstrate compliance.

40 CFR 63.7530 (d)
This section requires that the facility owner or operator submit a signed notice of compliance status that an initial tune-up of the unit was completed.

40 CFR 63.7530 (e)
This condition requires certification of the energy assessment be submitted as part of the Notice of Compliance (NOC).

40 CFR 63.7530 (h)
This condition specifies the work practice standards that a facility owner subject to emission limits must satisfy.

40 CFR 63.7535
This citation specifies data collection requirements for continuous compliance demonstration.

40 CFR 63.7540 (a)
This condition states how to demonstrate continuous compliance with emission limits, work practice standards, and operating limits.

40 CFR 63.7545 (c)
This condition states when an initial notification must be submitted for new and reconstructed sources

40 CFR 63.7545 (d)
This condition states when a notification of intent to conduct a performance test must be submitted

40 CFR 63.7545 (e)
This condition states the requirements of the notification of compliance status.

40 CFR 63.7550 (b)
This condition states when reports must be submitted.

40 CFR 63.7550 (c)
This condition states the requirements for the compliance report.

40 CFR 63.7550 (d)
This condition states the requirements for reporting deviations at facilities not using a continuous monitoring system.

40 CFR 63.7550 (e)
This condition states the requirements for reporting deviations at facilities using a continuous monitoring system.

40 CFR 63.7550 (h)
This condition specifies the procedures for submitted the required reports.

40 CFR 63.7555 (a)
This condition states what records must be kept.

40 CFR 63.7555 (b)
This condition states the recordkeeping requirements for continuous monitoring systems.

40 CFR 63.7555 (c)
This condition states the recordkeeping requirements for monitored data.

40 CFR 63.7555 (d)
This condition states the recordkeeping requirements for boilers and process heaters subject to emission limits.

40 CFR 63.7555 (i)
This condition states what records must be kept for startup and shutdown.

40 CFR 63.7555 (j)
This condition states what records must be kept regarding fuels used during startup and shutdown.

40 CFR 63.7560
This condition states in what form the records must be kept.

40 CFR 63.7565
This regulation specifies which provisions of the General provisions (Subpart A of 40 CFR 63) apply to the owner or operators of industrial, commercial, and institutional boilers at major source facilities of hazardous air pollutants.

40 CFR 64.7
This section states the general requirements of operating and maintaining the monitoring system approved under the facility's Compliance Assurance Monitoring (CAM) Plan.

40 CFR 64.8
This section lists the elements of a Quality Improvement Plan (QIP). A QIP may be required if a permittee has a number of exceedances or excursions of its Compliance Assurance Monitoring (CAM) program during during a reporting period.

40 CFR 64.9
This section specifies the general requirements for recording and reporting excursions or exceedances of CAM conditions and actions taken to implement a Quality Improvement Program (QIP), if applicable.

40 CFR Part 60, Subpart A
This regulation contains the General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements

40 CFR Part 61, Subpart A
This regulation, 40 CFR 61 Subpart A, lists the general provisions that a facility subject to a National Emissions Standard for Hazardous Air Pollutant is subject to.

40 CFR Part 61, Subpart M
This is the National Emission Standard for Asbestos and it includes provisions for handling and disposing of asbestos.

40 CFR Part 63, Subpart ZZZZ
This regulation specifies requirements for Reciprocating Internal Combustion Engines (RICE) at the facility.

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

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

6 NYCRR 201-6.4 (f)
This section describes the operational flexibility protocol proposed by the facility. The protocol will allow the facility owner or operator to make certain minor changes at the facility without the need for a permit modification. Changes made pursuant to the protocol must be approved by the Department, and will be rolled into the permit during the next renewal or modification.

6 NYCRR 201-6.6
Conditions under this citation specify requirements for modifying the permit.

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) (3)
Acceptable NOx RACT compliance plans submitted to the Department will become part of the State SIP.

6 NYCRR 212.10 (c) (4) (iii)
This section allows source owners who cannot achieve an overall removal efficiency of 81% or use

coatings that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the Department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the Department.

6 NYCRR 212.10 (f)
Owners and/or operators of NOx and VOC sources must submit a RACT compliance plan with each application for a permit to construct and implement this plan when operation commences. A RACT analysis is not required for sources with potential emissions less than 3 lb/hr and actual emissions less than 15 lb/day at facilities outside of the lower Orange County and New York City metropolitan areas.

6 NYCRR 212.4 (a)
This rule specifies the degree of emission control for compounds based on their toxicity and emission rate and, in some cases, the type of process. Degree of air cleaning required is specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6 NYCRR 212.4 (b)
This citations establishes an air cleaning requirements for limit on gas and liquid particulates.

6 NYCRR 212.4 (c)
This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6 NYCRR 212.6 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6 NYCRR 225-1.2 (a)
This regulation specifies sulfur-in-fuel limits for new coal fired facilities.

6 NYCRR 225-1.2 (c)
This regulation specifies the sulfur-in-fuel limitations for solid fuel fired facilities on or after July 1, 2014.

6 NYCRR 225-1.2 (e)
This regulation specifies the sulfur-in-fuel limits for residual oil in the remainder of the State on or after

July 1, 2014.

6 NYCRR 225-1.2 (f)
This regulation specifies the sulfur-in-fuel limits for the purchase of #2 heating oil on or after July 1, 2012.

6 NYCRR 225-1.2 (h)
This regulation specifies the sulfur-in-fuel limits for firing distillate oil on or after July 1, 2016.

6 NYCRR 225-1.4
This sections allows equivalent emission rate variances from the sulfur-in-fuel limits in section 2 of this Subpart.

6 NYCRR 225-1.5
This section establishes the sulfur emission and fuel monitoring required by this regulation.

6 NYCRR 225-1.6 (f)
This citation requires subject facilities to submit excess sulfur emissions reports to the Department.

6 NYCRR 227-1.2 (a) (1)
This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units of greater than 250 mmBtu/hr heat input capacity which fire coal, oil, or coal derived fuels.

6 NYCRR 227-1.2 (a) (4)
This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units which fire solid fuels at variable sizes of heat input (mmBtu/hr).

6 NYCRR 227-1.3 (a)
This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 227-1.4 (b)
This regulation requires the specific contents of excess emissions reports for opacity from facilities that employ continuous opacity monitors (COMs).

6 NYCRR 227-1.4 (c)
This is the applicability section for requiring the use of COMs for monitoring purposes.

6 NYCRR 227-2.4 (a) (1) (ii)
This citation includes NOx RACT presumptive limits effective 7/1/14.

6 NYCRR 227-2.4 (a) (2)
NOx requirements for very large boilers with configurations other than those listed in 227-2.4(a)(1).

6 NYCRR 227-2.4 (d)
This section includes NOx RACT requirements for small boilers, small combustion turbines, and small stationary internal combustion engines.

6 NYCRR 227-2.4 (e) (3)
NOx RACT requirements for combustion turbines fired with fuels other than natural gas or distillate oil.

6 NYCRR 227-2.5 (c)
This provision allows the owner or operator to demonstrate that the applicable presumptive RACT emission limit in section 227-2.4 of this Subpart is not economically or technically feasible. Based on this determination the Department is allowed to set a higher emission source specific emission limit.

6 NYCRR 227-2.6
This regulation establishes the compliance testing, monitoring, and reporting requirements for NOx RACT affected stationary combustion installations.

6 NYCRR 227-2.6 (b)
Any owner or operator of a combustion source subject to reasonably available control technology (RACT) requirements, under this subdivision, for NOx and either is required or opts to employ a continuous emissions monitoring system (CEMS) must:
1) Submit a CEMS monitoring plan for approval by the Department,

2) Submit a CEMS certification protocol,
3) Meet CEMS monitoring requirements as detailed in this paragraph of this subdivision, and
4) Meet CEMS recordkeeping and reporting requirements as detailed in this paragraph of this subdivision.

6 NYCRR 229.3 (e) (2) (iv)
This section requires a tank with submerged fill for storage of volatile organic liquids

6 NYCRR 229.3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6 NYCRR 229.5 (d)
This section requires facilities subject to the requirements under Part 229.3, to maintain a record of the capacity of the volatile organic liquid storage tanks, in gallons, for a period of 5 years.

6 NYCRR 231-6.2
This section establishes the requirements for performing a netting analyses.

6 NYCRR 231-8.2
This section establishes the requirements for performing a netting analyses.

6 NYCRR 242-1.4 (b)

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

6 NYCRR Part 226
This regulation specifies the general requirements, equipment specifications and operating requirements for open-top vapor, conveyorized and cold cleaning degreasers.

6 NYCRR Part 249

6 NYCRR Subpart 227-2
This regulation limits the emission of oxides of nitrogen (NOx) from stationary combustion installations (boilers, combustion turbines and internal combustion engines).

6 NYCRR Subpart 231-10

This subpart outlines the procedures used to create and use emission reduction credits (ERCs).

**Compliance Certification**
**Summary of monitoring activities at RED-ROCHESTER LLC AT EASTMAN BUSINESS PARK:**

| Location Facility/EU/EP/Process/ES | Cond No. | Type of Monitoring |
|---|---|---|
| U-00015 | 147 | record keeping/maintenance procedures |
| U-00015 | 148 | intermittent emission testing |
| U-00015/-/K14 | 212 | record keeping/maintenance procedures |
| U-00051/32102/K18/32111 | 269 | monitoring of process or control device parameters as surrogate |
| U-00015 | 150 | monitoring of process or control device parameters as surrogate |
| U-00015/-/K22 | 224 | record keeping/maintenance procedures |
| U-00015 | 153 | record keeping/maintenance procedures |
| U-00015 | 154 | record keeping/maintenance procedures |
| U-00015 | 155 | record keeping/maintenance procedures |
| FACILITY | 28 | monitoring of process or control device parameters as surrogate |
| FACILITY | 30 | record keeping/maintenance procedures |
| FACILITY | 31 | record keeping/maintenance procedures |
| FACILITY | 32 | record keeping/maintenance procedures |
| FACILITY | 33 | record keeping/maintenance procedures |
| U-00008 | 45 | record keeping/maintenance procedures |
| U-00008 | 46 | work practice involving specific operations |
| U-00015 | 156 | record keeping/maintenance procedures |
| U-00015 | 157 | record keeping/maintenance procedures |
| U-00015 | 158 | record keeping/maintenance procedures |
| U-00015 | 159 | record keeping/maintenance procedures |
| U-00015 | 160 | record keeping/maintenance procedures |
| U-00015/-/K14 | 213 | intermittent emission testing |
| U-00015/-/K14 | 214 | intermittent emission testing |
| U-00015/-/K14 | 215 | intermittent emission testing |
| U-00015/-/K14 | 216 | intermittent emission testing |
| U-00015/-/K16 | 219 | intermittent emission testing |
| U-00015/-/K16 | 220 | intermittent emission testing |
| U-00015/-/K16 | 221 | intermittent emission testing |
| U-00015/-/K16 | 222 | intermittent emission testing |
| U-00015/-/K16/321AJ | 223 | record keeping/maintenance procedures |
| U-00015/-/K23 | 226 | record keeping/maintenance procedures |
| U-00015/-/K23 | 227 | record keeping/maintenance procedures |
| U-00015/-/K23 | 228 | record keeping/maintenance procedures |
| U-00015/-/K23 | 229 | intermittent emission testing |

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|---|---|---|
| U-00015/-/K23 | 230 | intermittent emission testing |
| U-00015/-/K23 | 231 | intermittent emission testing |
| U-00015/-/K23 | 232 | intermittent emission testing |
| U-00015 | 161 | monitoring of process or control device parameters as surrogate |
| U-00015 | 162 | monitoring of process or control device parameters as surrogate |
| U-00015 | 163 | record keeping/maintenance procedures |
| U-00015/-/K23 | 233 | record keeping/maintenance procedures |
| U-00015 | 165 | record keeping/maintenance procedures |
| U-00015 | 167 | record keeping/maintenance procedures |
| U-00015/-/K23 | 236 | record keeping/maintenance procedures |
| U-00015 | 169 | record keeping/maintenance procedures |
| U-00015/-/K23 | 238 | record keeping/maintenance procedures |
| U-00015/-/K14 | 217 | record keeping/maintenance procedures |
| U-00015/-/K23 | 239 | record keeping/maintenance procedures |
| U-00015/-/K14 | 218 | record keeping/maintenance procedures |
| U-00015/-/K23 | 240 | record keeping/maintenance procedures |
| U-00015 | 173 | record keeping/maintenance procedures |
| U-00015/-/K23 | 241 | record keeping/maintenance procedures |
| U-00015 | 174 | record keeping/maintenance procedures |
| U-00015/-/K23 | 242 | record keeping/maintenance procedures |
| U-00015 | 175 | record keeping/maintenance procedures |
| U-00015/-/K23 | 243 | record keeping/maintenance procedures |
| U-00015 | 176 | record keeping/maintenance procedures |
| U-00015 | 177 | record keeping/maintenance procedures |
| U-00015 | 178 | record keeping/maintenance procedures |
| U-00015/-/K23 | 244 | record keeping/maintenance procedures |
| U-00015 | 179 | record keeping/maintenance procedures |
| U-00015/-/K23 | 245 | record keeping/maintenance procedures |
| U-00015 | 180 | record keeping/maintenance procedures |
| U-00015/-/K23 | 246 | record keeping/maintenance procedures |
| U-00015/-/K24 | 265 | record keeping/maintenance procedures |
| U-00015 | 181 | record keeping/maintenance procedures |
| U-00015 | 182 | record keeping/maintenance procedures |
| U-00015/-/K23 | 247 | record keeping/maintenance procedures |
| U-00015 | 183 | record keeping/maintenance procedures |
| U-00015/-/K23 | 248 | record keeping/maintenance procedures |
| U-00015 | 184 | record keeping/maintenance procedures |
| U-00015/-/K23 | 249 | record keeping/maintenance procedures |
| U-00015 | 186 | record keeping/maintenance procedures |
| U-00015/-/K23 | 250 | record keeping/maintenance procedures |
| U-00015 | 188 | record keeping/maintenance procedures |
| U-00015/-/K23 | 252 | record keeping/maintenance procedures |
| U-00015 | 189 | record keeping/maintenance procedures |
| U-00015/-/K23 | 253 | record keeping/maintenance procedures |
| U-00015 | 190 | record keeping/maintenance procedures |
| U-00015/-/K23 | 254 | record keeping/maintenance procedures |
| U-00015 | 191 | record keeping/maintenance procedures |
| U-00015/-/K23 | 255 | record keeping/maintenance procedures |
| U-00015 | 192 | record keeping/maintenance procedures |
| U-00015/-/K23 | 256 | record keeping/maintenance procedures |
| U-00015 | 193 | record keeping/maintenance procedures |
| U-00015/-/K23 | 257 | record keeping/maintenance procedures |
| U-00015 | 194 | record keeping/maintenance procedures |
| U-00015/-/K23 | 258 | record keeping/maintenance procedures |
| U-00015 | 195 | record keeping/maintenance procedures |
| U-00015/-/K23 | 259 | record keeping/maintenance procedures |
| U-00015 | 196 | record keeping/maintenance procedures |
| U-00015/-/K23 | 260 | record keeping/maintenance procedures |
| U-00015 | 197 | record keeping/maintenance procedures |
| U-00015/-/K23 | 261 | record keeping/maintenance procedures |
| U-00015 | 198 | record keeping/maintenance procedures |
| U-00015/-/K23 | 262 | record keeping/maintenance procedures |
| U-00015 | 199 | record keeping/maintenance procedures |

| | | |
|---|---|---|
| U-00015/-/K23 | 263 | record keeping/maintenance procedures |
| U-00008/-/K02 | 48 | record keeping/maintenance procedures |
| U-00008/09503 | 58 | record keeping/maintenance procedures |
| U-00008/09503 | 59 | record keeping/maintenance procedures |
| U-00008/09503 | 61 | record keeping/maintenance procedures |
| U-00008/09503 | 62 | record keeping/maintenance procedures |
| U-00008/09503 | 64 | record keeping/maintenance procedures |
| U-00008/09503 | 65 | record keeping/maintenance procedures |
| U-00008/09503 | 66 | record keeping/maintenance procedures |
| U-00008/09503 | 67 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 70 | record keeping/maintenance procedures |
| U-00008/09503 | 71 | record keeping/maintenance procedures |
| U-00008/09503 | 72 | record keeping/maintenance procedures |
| U-00008/-/K02 | 50 | record keeping/maintenance procedures |
| U-00008/09503 | 79 | record keeping/maintenance procedures |
| U-00008/-/K02 | 51 | record keeping/maintenance procedures |
| U-00008/09503 | 80 | record keeping/maintenance procedures |
| U-00008/09503 | 81 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 82 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 83 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 84 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 85 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 86 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 87 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 88 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 89 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 90 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 91 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 92 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 95 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 96 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 93 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 94 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 97 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 98 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 99 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 100 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 101 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 102 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 103 | monitoring of process or control device parameters as surrogate |
| U-00008/-/K02 | 52 | record keeping/maintenance procedures |

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|---|---|---|
| U-00008/-/K02 | 53 | record keeping/maintenance procedures |
| U-00008/09503 | 104 | record keeping/maintenance procedures |
| U-00008/09503 | 105 | monitoring of process or control device parameters as surrogate |
| U-00008/09503 | 106 | continuous emission monitoring (cem) |
| U-00015 | 201 | continuous emission monitoring (cem) |
| U-00015 | 202 | continuous emission monitoring (cem) |
| U-00015 | 203 | continuous emission monitoring (cem) |
| FACILITY | 36 | record keeping/maintenance procedures |
| FACILITY | 37 | record keeping/maintenance procedures |
| FACILITY | 38 | record keeping/maintenance procedures |
| FACILITY | 5 | record keeping/maintenance procedures |
| FACILITY | 6 | record keeping/maintenance procedures |
| FACILITY | 23 | record keeping/maintenance procedures |
| U-00015 | 113 | record keeping/maintenance procedures |
| U-00015 | 114 | record keeping/maintenance procedures |
| FACILITY | 7 | record keeping/maintenance procedures |
| U-00008 | 278 | record keeping/maintenance procedures |
| U-00008/09503 | 57 | record keeping/maintenance procedures |
| U-00008/R1601/K06 | 111 | record keeping/maintenance procedures |
| U-00008/R1601/K06 | 112 | monitoring of process or control device parameters as surrogate |
| U-00008/09601/K06/096AA | 109 | record keeping/maintenance procedures |
| U-00008/09601/K06/096AA | 110 | monitoring of process or control device parameters as surrogate |
| U-00008/-/K06/096AA | 279 | record keeping/maintenance procedures |
| U-00008/-/K06/096AA | 280 | monitoring of process or control device parameters as surrogate |
| U-00008/09503/K02 | 282 | record keeping/maintenance procedures |
| U-00008/R1601/K06 | 283 | record keeping/maintenance procedures |
| U-00008/09503 | 281 | record keeping/maintenance procedures |
| U-00008/09504/K06/095AG | 107 | monitoring of process or control device parameters as surrogate |
| U-00008/09508/K06/095AJ | 108 | monitoring of process or control device parameters as surrogate |
| U-00051/32106/K18/321AD | 270 | monitoring of process or control device parameters as surrogate |
| U-00051/32107/K18/321AE | 271 | monitoring of process or control device parameters as surrogate |
| U-00051/M9001/K18/M90AA | 272 | monitoring of process or control device parameters as surrogate |
| U-00008 | 43 | record keeping/maintenance procedures |
| U-00051 | 268 | record keeping/maintenance procedures |
| U-00015 | 115 | work practice involving specific operations |
| U-00015 | 116 | work practice involving specific operations |
| U-00015 | 117 | work practice involving specific operations |
| U-00015 | 118 | work practice involving specific operations |
| U-00015 | 119 | work practice involving specific operations |
| U-00015 | 120 | record keeping/maintenance procedures |
| U-00015 | 121 | record keeping/maintenance procedures |
| U-00015 | 122 | record keeping/maintenance procedures |
| U-00015 | 123 | record keeping/maintenance procedures |
| U-CLEAN | 273 | record keeping/maintenance procedures |
| U-00015/-/K07 | 204 | record keeping/maintenance procedures |
| U-00015/-/K12 | 207 | intermittent emission testing |
| U-00015/-/K23 | 225 | intermittent emission testing |
| U-00015/-/K13/321AH | 209 | intermittent emission testing |
| U-00015/-/K13/321AI | 210 | intermittent emission testing |
| E-NGINE | 41 | monitoring of process or control device parameters as surrogate |
| U-00015 | 124 | continuous emission monitoring (cem) |
| U-00015 | 125 | intermittent emission testing |
| U-00015 | 126 | record keeping/maintenance procedures |
| U-00015 | 128 | record keeping/maintenance procedures |
| U-00015 | 129 | record keeping/maintenance procedures |

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| U-00015 | 130 | continuous emission monitoring (cem) |
| U-00015 | 131 | continuous emission monitoring (cem) |
| U-00015 | 132 | continuous emission monitoring (cem) |
| U-00015/-/K13 | 208 | continuous emission monitoring (cem) |
| E-NGINE | 42 | record keeping/maintenance procedures |
| U-00015 | 133 | continuous emission monitoring (cem) |
| U-00015/-/K07 | 205 | work practice involving specific operations |
| U-00015/-/K07 | 206 | intermittent emission testing |
| U-00015 | 134 | record keeping/maintenance procedures |
| U-00015 | 135 | record keeping/maintenance procedures |
| U-00008/-/K04 | 54 | record keeping/maintenance procedures |
| U-00015/-/K25 | 266 | record keeping/maintenance procedures |
| U-00015/-/K13/321AI | 211 | monitoring of process or control device parameters as surrogate |
| U-00015 | 136 | monitoring of process or control device parameters as surrogate |
| U-00015 | 137 | monitoring of process or control device parameters as surrogate |
| U-00015 | 138 | monitoring of process or control device parameters as surrogate |
| U-00015 | 139 | monitoring of process or control device parameters as surrogate |
| U-00015 | 140 | monitoring of process or control device parameters as surrogate |
| U-00015 | 141 | monitoring of process or control device parameters as surrogate |
| U-00015 | 142 | monitoring of process or control device parameters as surrogate |
| U-00015 | 143 | monitoring of process or control device parameters as surrogate |
| U-00015 | 144 | monitoring of process or control device parameters as surrogate |
| U-00015 | 145 | monitoring of process or control device parameters as surrogate |
| U-00015 | 146 | monitoring of process or control device parameters as surrogate |
| U-00015 | 284 | record keeping/maintenance procedures |
| U-00015 | 285 | record keeping/maintenance procedures |

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**Basis for Monitoring**
**DESCRIPTION OF MONITORING REQUIREMENTS**

**6 NYCRR Part 201 Permits and Registrations**
**6NYCRR Part 201-6.4(c )(3)(ii)**
This is a standard condition requiring submittal of semi-annual compliance and deviation reports. Deviations of monitoring conditions in the permit must be reported in detail. Also this condition establishes procedures and time frames for prompt notification of certain permit deviations and incidences of non-compliance.

**6NYCRR Part 201-6.4(e)**
This standard condition specifies the requirements for the annual compliance certification report.

**6NYCRR Part 201-6.4(f)**
This facility-level condition establishes “Operational Flexibility” 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 under 6 NYCRR 201-6.4(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.

Another monitoring condition has been included under this citation for Emission Unit U-00015 to allow for temporary reconfiguration of the Bldg 321 boiler stacks during stack maintenance procedure which occur approximately twice during the 5 year term of the permit.

**6NYCRR Part 201-6.6**
This permit includes equipement and requirements to address two different possible operating scenarios. A condition has been included under this citation which describes these two different possibilities for RED to implement the conversion of the powerplant depending on natural gas availability. The condition requires that RED notify the Department as to which scenario they've chosen and submit an application for a minor modification of this permit in order to remove the unnecessary equipment and provisions and allow for other updates at that time.

**6NYCRR Part 202- Emission Statements**
**6NYCRR Part 202-2.1**
This standard facility-level conditions establishes the deadline for annual emission statement reporting.

**6NYCRR Part 211 General Prohibitions**
**6NYCRR Part 211.2**
A monitoring condition has been included for Emission Unit U-00008 to establish procedures for odor compliant investigation and response at the Kings Landing Waste Water Treatment Plant. The condition requires that records be kept of any reported odor problems and subsequent follow up.

**6NYCRR Part 212 General Process Emission Sources**
**6NYCRR Part 212.4(a)**
For emission points having authorized emissions which exceed the thresholds for a required percentage of control according to Tables 2, 3, or 4 of Part 212, conditions are included in the permit which specify monitoring requirements for control devices and/or process parameters. Two monitoring conditions are included in the permit (EU U-00008) to ensure proper operation of the carbon adsorption system to control emissions from the Grit Chamber (ES 096AA) at the Kings Landing Waste Water Treatment Plant (WWTP).

In other cases where it has been demonstrated that it is not feasible to meet the specified control percentage, a Best Available Control Technology (BACT) evaluation is done and a condition specifying an alternate limit and record keeping requirements is included in the permit as allowed by 212.5(d). As such, an alternate limit has been included in the permit for methylene chloride (DCM) emissions from several sources located at Kings Landing WWTP (EU U-00008) which are all ducted to the trickling

filter/odor control scrubber system ( EP R1601). The condition limits DCM emissions to 3.5 tons per year (tpy) and specifies record keeping procedures.

In the case of the Multiple Hearth Incinerator (MHI), also located at the Kings Landing WWTP (EU U-00008), emissions of organics and metals are controlled by a series of control devices which meet the requirements of the Hazardous Waste Combustor MACT rule (40 CFR 63 Subpart EEE). A part 212.4(a) monitoring condition is included for the MHI which refers to the extensive operating requirements included in the MACT permit conditions for Emission Unit U-00008 (EP 09503).

**6NYCRR Part 212.4(b)**
A monitoring condition is included to ensure compliance with the 0.015 grain/dscf particulate limit for the Multiple Hearth Incinerator (EU U-00008). Particulate emissions from the incinerator are controlled via a series of devices, meeting the requirements of the Hazardous Waste Combustor MACT rule (40 CFR 63 Subpart EEE). Numerous operating parameters to ensure compliance with the MACT standards also serve to ensure good control of particulate emissions regulated under this citation.

**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 included in the permit under this citation require monitoring of control equipment and/or process parameters, periodic maintenance, and record keeping to indicate mandated control of particulate emissions. For example, two conditions for dust collectors under Emission Unit U-00008 associated with Bldg 95 multiple hearth incinerator operations and two others for dust collectors under U-00015 coal and ash handling operations specify monitoring of pressure drop across a particulate filter (baghouse, HEPA filter,etc...). Maintaining the pressure drop within the proper range specified by the manufacturer or demonstrated through operating experience is a common monitoring method used to ensure that the filter is intact and providing the collection efficiency as designed.

Some 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, the Bldg 321 coal bunker ventilation system typically has very low particulate emission rates. In this case, process knowledge, operating conditions, emission sampling data and calculations, and other information from the permit file are used assess and demonstrate on-going compliance. For such sources, the permit requires that on a semiannual basis, RED review all of the data and operating parameters related to the particulate emission rate (ex. production rate, raw material supply, air flow etc..) to verify the accuracy of the reported particulate emission rate. Additionally, the permit condition requires that they investigate and correct any instance where there is cause to believe that particulate emissions above 0.05 grains/dscf are occurring or have occurred. If there is still a doubt as to whether the standard is being met, the Department may require a particulate stack test at any time.

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

For larger particulate emission sources where opacity has historically been a more common problem opacity monitoring devices may be required either by regulation or through the permit. In this case, the

permit condition would require on-going or continuous compliance demonstration through the direct measurement of opacity in the stack. Opacity monitors for some of RED's combustion sources are required under Part 227 citaitons in this permit.

Emission Unit U-00008 and U-00051 both include particulate sources subject to opacity monitoring requirements under this citation. These sources do not warrant continuous opacity monitors. With particulate control requirements in place (or the limited potential emissions without controls) these sources are less likely to have excessive opacity. 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)(3)**
Under this citation, Reasonably Available Control Technology (RACT) limits for oxides of nitrogen (NOx) emissions from process sources are established. Emission source 095AF, RED's Multiple Hearth Incinerator (MHI) which is used to incinerate wastewater sludge and grit form the King's Landing Wastewater Treatment Plant, is subject to the NOx RACT requirements under this citation. Based on the most recent evaluation of available control options, no additional NOx controls were deemed both technically and cost effective and a NOx limit and record keeping requirements are included in the permit.

**6NYCRR Part 212.10(c)(4)(iii)**
Under this citation, two permit conditions are included under EU U-00008 for the Kings Landing Scrubber system to establish RACT (Reasonably Available Control Technology) limits for volatile organic compounds (VOCs). The scrubber system, vented to EP R1601, was designed to control odors from the trickling filters, sludge holding tanks and centrifuge- and not primarily for VOC control. To maximize effectiveness on VOCs, a condition requires that the blowdown rate be maintained above a set rate. Data must be collected by a reliable control system. Also, based on the most recent RACT evaluation which concluded that no additional VOC controls were effective on both a technilogical and cost basis, a VOC limit is established. This permit conditions requires record keeping to demonstrate compliance with the limit on a 12 month rolling basis and periodic reevaluation of RACT. The method of calculating VOC emissions from the trickling filter scrubber is based on the Kings Landing influent sampling data and is described in the permit condition.

**6NYCRR Part 212.10(f)**
Emissions from the Kings Landing Grit Chamber (ES 096AA) are controlled by a carbon adsorption system (Control Device 09601) to meet the requirements of VOC RACT (Reasonably Available Control Technology). Two conditions are included in the permit (EU U-00008, Process K06) under this citation which specify monitoring and work practice procedures to ensure that optimal VOC control is achieved.

An alternative monitoring method, as allowed under 212.11(b)(3), has been approved for this carbon absorption control system on the Grit Chamber. Rather than installing a continuous monitoring system to measure the concentration of volatile organic compounds at the outlet of the control system, a regular interval for changing the carbon has been established based on extensive emissions monitoring done at the time the system was installed. For additional protection against potential break-through of contaminants, two carbon canisters are used in series such that one is always providing back-up control. In addition, RED is required to maintain the inlet air flow within an acceptable range to operate the carbon control system. DEC approved this alternative monitoring method because it provides equal, if not better, protection than an outlet monitor prescribed in the regulation.

The system shall be comprised of two carbon beds arranged in series such that one bed serves as the primary control with the other serving as a backup at any given time. Based on the contaminant loading, influent wastewater flow at King's Landing, and an analysis provided by the carbon vendor dated March 11, 2011), the carbon beds shall be changed at a minimum of six times per calendar year at a frequency not to exceed 62 days, excluding time periods when the Grit Chamber is not in operation. Prior to the end of each 62 day operating period, the air flow will be re-directed to the backup bed and the carbon in the primary bed will be removed and replaced. The bed with the fresh carbon will then be put back into service in the back-up position. Records of maintenance to the system and carbon bed replacements are required to be kept.

Because the inlet loading to Kings Landing may continue to decrease and operators have indicated that the 62 day change-out may be unnecessarily wasteful, a provision has been included that RED re-evaluate the frequency of changing the carbon bed prior to their next permit renewal.

**6 NYCRR Part 225 Sulfur in Fuel**

As part of the Title V Renewal application, RED revised the Fuel Sampling and Analysis Plan (approved October 2014).

**6NYCRR Part 225-1.2(a)**

A condition under this citation is included for RED's coal-fired Boiler 44 (ES 321AJ), which is limited buring coal with a maximum of 0.60 pounds of sulfur per million BTU gross heat content. Because RED burns a mixture of fuels in their boilers, they will demonstrate compliance with this limit as well as other sulfur-in-fuel limits for other boilers by keeping records to show that they meet the calculated equivalent emission rate as described in Section 225-1.4. The permit indicates that sulfur data must be collected, tabulated, and reported quarterly according the requirements and in accordance with RED's Fuel Sampling and Analysis Plan.

**6NYCRR Part 225-1.2(c)**

A condition under this citation specifies the sulfur-in-fuel limits for RED's older coal-fired boilers, Units 42 & 43 (ES 321AH and ES 321AJ). As with Boiler 44 desribed above, compliance for Boilers 42 & 43 will be demonstrated through the use of a calculated equivalent emission rate in accordance with 225-1.4 and RED's Fuel Sampling and Analysis Plan.

**6NYCRR Part 225-1.2(e)**

A condition under this citation states the 0.5% sulfur by weight limit for #6 fuel oil burned in RED's boilers. Compliance demonstration will be done in accordance with the 225-1.4 and the Fuel Sampling Analysis Plan.

**6NYCRR Part 225-1.2(f)**

As of July 2012, a more stringent sulfur limit applies to #2 fuel oil burned in RED's boilers. Where a mixture of fuels is burned, compliance with this limit will be factored in to the equivalent emission rate allowed by Part 225-1.4. Record keeping and quarterly reporting will be done in accordance with the approved Fuel Sampling and Analysis Plan.

**6NYCRR Part 225-1.2(h)**

A more stringent sulfur in fuel limit of 0.0015% sulfur by weight for Distillate Oil will go in affect July 2016. Compliance will be monitored and reported according to Part 225-1.4 and the Fuel Sampling and Analysis Plan as described above.

**6NYCRR Part 225-1.4**

Two conditions under this citations describe the compliance demonstration for a fuel mixture via the equivalent emission rate on a quarterly basis and an annual basis.

**6NYCRR Part 225-1.5**
In addition to reiterating the requirements for sulfur in fuel sampling and compliance demonstration through the equivalent emission rate pursuant to section 225-1.4 and RED's Fuel Sampling Analysis Plan, this condition includes the requirements to record daily measurements of the rate each fuel is fired, weekly gross heat and ash content of fuels, and the electrical generation for sale.

**6NYCRR Part 225-1.6(f)**
A condition under this citation requires that any exceedances of the equivalent emission rate be reported in the next quarterly report.

**6NYCRR Part 226 Solvent Metal Cleaning Processes**
A condition is included which states the equipment specifications, operating requirements, and work practice standards for RED's cold cleaning degreasers. These work practice requirements must be adhered to on a continuous basis whenever the sources are in use. For monitoring compliance with these requirements, a log is kept near the cleaning unit where solvent usage and any deviations from the required work practices are recorded by the operator.

**6NYCRR Part 227 Stationary Combustion Installations**
**6NYCRR Part 227-1**

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

Boilers greater than 250 mmbtu/hr in size which burn oil (Package Boilers 1-4, Boilers 42 & 43, Boiler 44, and the new HP and MP Dual-Fueled Boilers) are subject to a particulate limit of 0.10 lb/mmbtu. With the exception of the Package Boilers which will be decommissioned, these boilers burn oil as a start-up/back-up fuel amounting to a small percentage of their overall operating time and require stack testing at the Department's request to demonstrate compliance with the particulate emission limit. The condition for the Package Boilers require annual tune-ups to assure best operation of each boiler. Monitoring conditions have been included in this permit to establish the 0.010 lb/mmbtu limit and testing requirements for each of these boilers except for Boiler 44, which is instead subject to a more stringent particulate limit of 0.035 lb/mmbtu. This more stringent limit for Boiler 44 was established under Prevention of Significant Deterioration (PSD) review at the time of the initial construction (around 1986) and is included in the permit under 40 CFR 52.21.

**6NYCRR Part 227-1.2(a)(3)**
Boiler 44 burns coal and is subject to particulate limit of 0.10 lb/mmbtu under this citation. However, it it also subject to the more stringent limit of 0.035 lb/mmbtu established under 40 CFR 52.21, the Prevention of Significant Deterioration (PSD) rule at the time of construction around 1986. Therefore, the 0.035 particulate limit remains under the 52.21 citation in this permit, superceding the less stringent Subpart D and Part 227-1 limits. Because the boiler is not equipped with a continuous monitoring device for particulate emissions, a three hour opacity limit has been established as a surrogate under the Continuous Assurance Monitoring (40 CFR 64 CAM) requirements. In addition to the CAM opacity monitoring condition under 40 CFR 64 in this permit, RED is required to conduct periodic stack testing (once during permit term) to demonstrate compliance with the 0.035 lb/mmBtu limit.

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

Under this citation, monitoring conditions are included for the two older coal boilers (Boilers 42 and 43). Particulate emission limits are based on the boilers' heat input capacity as specified in Table 1 of the rule. Because these boilers are not equipped with a continuous monitoring device for particulate emissions, a three hour opacity limit has been established as a surrogate under the Continuous Assurance Monitoring (40 CFR 64 CAM) requirements. In addition to the CAM opacity monitoring condition under 40 CFR 64 in this permit, RED is required to conduct periodic stack testing (once during permit term) to demonstrate compliance with the particulate limits.

**6NYCRR Part 227-1.3(a)**
Condition are included to requiring monitoring of opacity from sources which may emit visible emissions. For RED's larger (> 250 mmBtu/hr) combustion sources which burn coal or oil, continuous opacity monitors (COMs) will be used to demonstrate compliance with the opacity standards. For smaller combustion sources and larger natural gas-fired installations, COMs are not required. Instead, the conditions require Method 9 (visible emission observations) to be done within 180 days of initial startup. After that, visible emissions are observed periodically to ensure that the source is operating properly. No visible emissions are expected from natural gas fired sources. If visible emissions are seen, a follow-up Method 9 and corrective measures are required. Though, not exactly the same, these monitoring conditions were written to be equivalent to opacity monitoring requirements that would apply to RED's new boilers under 40 CFR 60 Subpart Db. The monitoring condition included under this citation also covers similar Subpart D opacity requirements for Boiler 44.

**6NYCRR Part 227-1.4(b)**
Where a continuous opacity monitor is used to demonstrate compliance with the opacity standard, an excess emission report is required on a quarterly basis. A condition is included here to specify the content of that quarterly report. In addition to the information specified by the rule, REDs permit requests additional details regarding the circumstances of any excess emissions if they are related to startup,shutdown, or malfunction conditions and an indication of whether the Department was notified in these cases.

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

**6NYCRR Part 227-2.4(a)(1)(ii)**
Two conditions are included here - one for the new gas-only boilers and one for the new gas/oil dual fueled boilers. The conditions state the NOx limits and specify Continuous Emission Monitoring (CEM) requirements to be followed for demonstrating compliance witht the NOx limits.

**6NYCRR Part 227-2.4(a)(2)**
Two conditions included under this citation specify NOx limits for the older coal-fired boilers. The limits are in units of lb/mmbtu and were established by the most recent NOx RACT evaluation, dated January 2015. These limits are unchanged from the earlier NOx RACT determination. The limited remaining life of these coal boilers was a factor for purposes of determining the cost effectiveness of additional NOx controls. In the case that Boiler 44 is not converted to natural gas and remains operational on coal (Scenario 2), the permit requires that NOx RACT be re-evaluated.

**6NYCRR Part 227-2.4(d)**
RED operates small internal combustion engines which are required under this NOx RACT citation to be tuned-up annually.

**6NYCRR Part 227-2.4(e)(3)**

A condition under this citation establishes the NOx emission limit for RED's new turbines and Heat Recovery Steam Generating (HRSG) equipment. Each of the three turbine/HRSG combinations will be equipped with SCR and exhausted together through a stack (EPs PGT01, PGT02, PGT03). The HRSG duct burners cannot be operated separately from the turbines. The permit requires that compliance with the stack limit will be monitored via certified CEMs. The 0.02 lb/mmbtu NOx limit required under this condition was based on the case-by-case RACT determination dated June 2014(Revised March 2015) and submitted as Appendix F of RED's application. This limit is more stringent than either 40 CFR 60 Subpart Db limit for the duct burners alone, or the 40 CFR Subpart GG limit for the turbines.

**6NYCRR Part 227-2.5(c)**
Based on the most recent RACT demonstration, dated January 2015, a 0.57 lb/mmbtu NOx limit has been established for each of the Package Boilers 1, 2, 3 and 4 (ES 031AC, 031AD, 031AE, 031AF). These package boilers are scheduled to be shut down by January 2018. The limited remaining life of the boilers was a factor for purposes of determining the cost effectiveness of additional NOx controls. Therefore, the permit requires RED to notify the Department at least 6 months before the scheduled shut down of their plans to decommission the boilers or else submit a revised NOx RACT plan.

A second condition under this citation requires that RED maintain the package boilers within the existing fuel use limits established by the previous permit and factored into their case-by-case NOx RACT determination. RED will continue to submit an annual report of the fuel oil use for each package boiler to demonstrate compliance with this restriction.

**6NYCRR Part 227-2.6**
A condition under this citations specifies which boilers are required to use continuous emission monitors (CEMS) for NOx and the associated quarterly reporting requirements, including the CEMs perfomance audits, downtime, and excess emissions reporting.

**6NYCRR Part 227-2.6(b)**
A condition under this citation specifies the requirements for certifying the required NOx CEMs. The condition references the requirements for testing, record keeping and reporting.

**6NYCRR Part 229 Petroleum and Volatile Organic Liquid Storage and Transfer**
**6NYCRR Part 229.5(d)**
The facility must maintain a record of the capacity of each Volatile Organic Liquid storage tanks subject to the rule and verify those records annually.

**6NYCRR Part 231 New Source Review for New and Modified Facilities**
RED's proposed powerhouse conversion project has been evaluated as a modification to an existing major facility under Subparts 231-6 and 231-8. According to the netting provisions in each of these subparts, an analysis was done which shows the proposed modification exceeds the significant project thresholds for CO, NOx, VOC, Particulate, PM-10, PM2.5 and greenhouse gases (GHGs) but does not result in a signficant net emissions increase, thereby avoiding additional NSR/PSD limits and requirements. RED has applied for and obtained Emission Reduction Credits (ERCs) based on the reductions from boilers to be shut down. With these ERCs quantified and documented in this permit, the net emissions are below the Part 231 significance thresholds for each of these contaminants except for CO and Greenhouse gases (GHGs).

In the case of CO, RED will comply with an emission limit under 231-8.2 (discussed below) such that net emissions remain below the 100 tpy threshold. CO catalysts for the new equipment are included in the permit as an option for RED to meet the CO limit. The installation of CO catalysts would allow RED more flexibility to operate and maintain compliance with the CO limit.

For GHGs, no further New Source Review/Prevention of Significant Deterioration requirements will apply since there is no other pollutant triggering the thresholds. This determination is based on the Supreme Court ruling on Utility Air Regulatory Group vs. EPA and is supported by DEC's enforcement discretion memo on this subject.

**6 NYCRR Part 231-6.2**
Conditions have been included to document the limits for NOx and VOC emissions in the Ozone Transport Region that result from RED's project netting. To avoid a New Source Review (NSR) major modification where the proposed modification exceeded the significant project threshold, RED used emission reduction credits in accordance with the requirements under this section of the rule, to limit the net emission increase below the thresholds. Three conditions under this citation limit NOx (Scenario 1 & Scenario 2) and VOC (Scenario 1) emissions based on the netting analysis (last revision June 2015) of RED's Title V modification application. The limits included here are the sum of the Project Emission Potential (PEP) and the Projected Actual (PA) Emissions of the existing equipment being modified under the project. The PEP used to calculate these emission limits assumes the maximum operation of the equipment possible to meet the CO cap with all proposed CO catalysts operational.

Scenario 1:
NOx PEP (506.0 tpy) + PA of Boiler 44 (178.0 tpy) = 684.0 tpy limit
VOC PEP (41.9 tpy) + PA of Boiler 44 (2.1 tpy) = 44.0 tpy limit

Scenario 2:
NOx PEP (256.4 tpy) + PA of Boiler 43 (168.0 tpy) = 424.4 tpy limit

Emission Reduction Credits established and used as part of this project are documented in separate conditions at Subpart 231-10.

**6 NYCRR Part 231-8.2**
Conditions have been included to limit emissions of Particulate, PM-10 and PM2.5 that result from RED's project netting. To avoid a New Source Review (NSR) major modification where the proposed modification exceeded the significant project threshold, RED used emission reduction credits in accordance with the requirements under this section of the rule, to limit the net emission increase below the thresholds (PM = 25 tpy; PM-10 = 15 tpy; PM2.5 = 10 tpy). Six conditions, reflecting Scenario 1 and Scenario 2, limit emissions of the three contaminants. The limits included here are the sum of the Project Emission Potential (PEP) and the Projected Actual (PA) Emissions of the existing equipment being modified under the project. The PEP used to calculate these emission limits assumes the maximum operation of the equipment possible to meet the CO cap with all proposed CO catalysts operational.

Scenario 1:
PM PEP (61.8 tpy) + PA of Boiler 44 (9.4 tpy) = 71.2 tpy limit
PM10 PEP (61.8 tpy) + PA of Boiler 44 (9.4 tpy) = 71.2 tpy limit
PM2.5 PEP (61.8 tpy) + PA of Boiler 44 (9.4 tpy) = 71.2 tpy limit

Scenario 2:
PM PEP (39.2 tpy) + PA of Boiler 43 (67.2 tpy) = 106.4 tpy limit
PM10 PEP (39.2 tpy) + PA of Boiler 43 (57.3 tpy) = 96.5 tpy limit
PM2.5 PEP (39.2 tpy) + PA of Boiler 43 (47.5 tpy) = 86.7 tpy limit

For Carbon Monoxide (CO), RED will limit emissions to avoid a New Source Review (NSR) major modification. In the case of CO, the projected emissions would exceed the 100 tpy significant project threshold. Therefore, RED will use emission reduction credits available to them through the shutdown of older boilers, but will still need to limit CO emissions such that the net emission increase remains below the threshold. Two conditions have been included to establish these limits and the associated record keeping for CO under the two different project scenarios. The CO caps are the sum of the Significance Threshold - 1 ton (99 ton allowable increase), the ERCs, and the Modified Source Projected Actual, as shown below:

Scenario 1:
CO cap: 108.8 tons Project ERCs + 42.3 tpy Potential Actual Emissions of modifed Boiler 44 + 99 tpy allowable increase = 250.0 tpy
Scenario 2:
CO cap: 103.4 Project ERCs + 5.4 tpy Potential Actual Emissions of limited use Boiler 43 + 99 tpy allowable increase = 207.8 tpy (conservatively rounded to 207.0 tpy cap in the permit)

**6 NYCRR Part 231-10**
A condition is included under this citation to establish an operating limit for coal-fired Boiler 43 (ES 321AI) under Scenario 2. If the boiler were to remain in service, its operation would be limited to its 10% annual capacity factor, or 560,000 mmbtu of heat input per year. This enforceable limit establishes a baseline to establish Emission Reduction Credits (ERCs) resulting from the 90% curtailment of the boiler. This limit also defines the boiler as a limited-use boiler for purposes of limited applicability under the Subpart DDDDD Boiler MACT rule. The condition specifies that records of fuel use and operating time will be kept to ensure compliance with the heat input limit on a twelve month rolling basis.

Two Special conditions are also included under this citation which document the quantities of Emission Reduction Credits (ERCs) established and used as part of the powerhouse conversion project. These ERC quantities are documented on the ERC Quanitification Forms in Attachment B of RED's permit application (Revised March, 2015) and the Use of ERC Forms in Attachment A of RED's application (Revised June 2015). The quantities of ERCs used for the netting project are based on the Project Emission Potential (PEP) minus the allowable increase (Significance threshold minus 1 tpy) as shown below. The PEP for each contaminant is based on maximized operation of the sources while maintaining a level necessary to meet the CO cap.

Scenario 1 - ERCs Used:
NOx: PEP - (Significance Threshold - 1) = 505.9 tpy - 39 tpy = 466.9 tpy
PM: PEP - (Significance Threshold - 1) = 61.8 tpy - 24 tpy = 37.8 tpy
PM10: PEP - (Significance Threshold - 1) = 61.8 tpy - 14 tpy = 47.8 tpy
PM2.5: PEP - (Significance Threshold - 1) = 61.8 tpy - 9 tpy = 52.8 tpy
VOC: PEP - (Significance Threshold - 1) = 41.9 - 39 = 2.9 tpy
CO: Use all 108.8 tpy ERCs available to establish cap

Scenario 2 - ERCs Used
NOx: PEP - (Significance Threshold - 1) = 256.4 tpy - 39tpy = 217.4 tpy
PM: PEP - (Significance Threshold - 1) = 39.2 tpy - 24 tpy = 15.2 tpy
PM10: PEP - (Significance Threshold - 1) = 39.2 tpy - 14 = 25.2 tpy
PM2.5: PEP - (Significance Threshold - 1) = 39.2 tpy - 9 = 30.2 tpy
CO: Use all 103.4 tpy ERC available to establish cap

**6 NYCRR Part 237 CAIR Program for Nitrogen Oxide**
This regulation has been repealed. In the previous version of the permit, a condition was included under paragraph 237-1.4(c)(1) which restricted electric output to the grid to maintain the exempt status under this CAIR Program for Nitrogen Oxide emissions. This condition has been removed from the permit because the rule is no longer in affect. However, RED's electrical output to the grid is still limited by restrictions cited under Part 242-1.4(b) for the CO2 Budget Trading Program.

**Part 242: CO2 Budget Trading Program**
6NYCRR Part 242-1.4(b)
Restricts electric output to the electric grid to 10% of the annual gross generation of the boiler to maintain the exempt status under the proposed RGGI rule for Carbon Dioxide emissions.

**Part 243: CAIR NOx Ozone Season Trading Program**
**Part 244: CAIR NOx Annual Trading Program**
**Part 245: CAIR SO2 Trading Program**
Conditions in the previous version of the permit which described the requirements under the Clean Air Interstate Rule (CAIR) trading program rules have been removed. As of January 1, 2015, the CAIR program, including Parts 243, 244 and 245, will no longer be supported at the Federal level when it is superseded by the Federal CSAPR program. Non-Electric Generating Units are no longer part of the budget trading programs.

**6NYCRR Part 249 Best Available Retrofit Technology**
Conditions were added to the previous version of this permit to reflect the approved (11/21/11 letter from NYSDEC to SUEZ-DEGs) Best Available Retrofit Technology (BART) Plan. These conditions stated the commitment to 1) retire Boiler 41 by December 31, 2013 and 2) retire or repower Boiler 42 by the compliance date of the boiler MACT rule or by August 16, 2017, whichever is sooner. If Boilers 43 and 44 remain in service, they will need to meet the MACT rule. Boiler 41 has been retired as scheduled. That condition has been eliminated from the permit. The BART requirements for Boiler 42 remain.

Potentially eligible BART units at Kings Landing WWTP (Emission Points 09503 and 09508) meet the exemption requirements in 6NYCRR Part 249.1(c)(3) as documented in a response letter from Robert Sliwinski, NYSDEC to Michael Zapkin, Kodak (Subject: BART Eligibility Analysis for Eastman Kodak Company Small Emission Sources at Eastman Business Park), dated September 2010.

**40 CFR 52-A.21 Prevention of Significant Deterioration**
The permit includes three PSD limits under this citation for Boiler 44 which date back to the initial permitting of Boiler 44 construction project around 1986. A condition is included under 52.21 stating a particulate limit of 0.035 lb/mmbtu for Boiler 44. Previous versions of the permit showed this same limit in two different conditions for coal and no.2 fuel oil combustion. This limit is more stringent than the otherwise applicable limits: 40 CFR 60 Subpart D (60.42(a)(1)) or Part 227-1.2(a)(3).
Because the boiler is not equipped with a continuous monitoring device for particulate emissions, a three hour opacity limit has been established as a surrogate under the Continuous Assurance Monitoring (40 CFR 64 CAM) requirements. In addition to the CAM opacity monitoring condition under 40 CFR 64 in this permit, RED is required to conduct periodic stack testing (once during permit term) to demonstrate compliance with the 0.035 lb/mmBtu limit.

Two conditions are included which specify a carbon monoxide limit for Boiler 44 while burning coal and no.2 fuel oil of 0.03 lb/mmbtu. This limit is assumed to have been established at the time of the intial PSD review for Boiler 44 construction.

Also resulting from a past PSD review, there is a condition to limit particulate emissions from the coal crusher (ES 321AA) to 0.005 grains/dscf. Compliance with this limit is ensured by controlling emissions with a baghouse and continuously monitoring the pressure drop such that proper control is maintained. The pressure drop range was established based on historical baseline data and operator experience. A six minute averaging time allows for some instanteous pressure fluctuations in the system which tend to occur upon startup and shutdown of equipment tied into this ventilation system.

The previous version of the Boiler Title V Permit included conditions (#66 – 75) cited under 40 CFR 52.21 to reflect the results of netting analyses undertaken by Kodak for two modifications of Boilers 42 and 43. These projects did not result in a significant net emissions increase. The shutdown of Bldg 31 boilers resulted in significant emission reductions. These reductions, along with other permitted emission changes at the Kodak facility which occurred within the 5 year contemporaneous period allowed by the rule, result in a net emission reduction. Consistent with 40 CFR 52.21(r)(6), permit conditions were included in the permit to ensure that emissions from Boilers 42 and 43 do not exceed the Future Projected Actual Emissions used in the netting analysis. Emissions of the subject contaminants were required to be tracked for both projects for a period of five years. Reporting to track emissions following the first modification of both Boilers 42 & 43 (permitted Jan 2007) began with June 2007 -July 2008 report and was completed with the July 30, 2012 report. Reporting for the second project - the Boiler 42 burner modification (permitted March 2009) began with the June 2010 report and was completed with the July 2014 report. Therefore, these reporting requirements (Conditions 66-75) have been eliminated from the permit.

**40 CFR Part 60 Standards of Performance for New Stationary Sources**
**40 CFR 60-A General Provisions**
A standard condition under this citation references the general requirements for monitoring, record keeping and reporting for operations subject to federal New Source Performance Standards (NSPS).

**40 CFR 60 Subpart D Standards of Performance for Fossil-Fuel-Fired Steam Generators**
As a very large boiler constructed after 1971, coal-fired Boiler 44 (ES 321AJ) is subject to requirements of NSPS Subpart D.

**40 CFR 60.42 Standards for Particulate**
When and if Boiler 44 is converted to No.2 fuel oil and natural gas, the boiler is exempt from the particulate limits in Subpart D in accordance with 40 CFR 60.42(e).

Under paragraph 40 CFR 60.40(a)(1), Boiler 44 would be subject to a particulate limit of 0.10 lb/mmbtu. However, at the time of construction a more stringent particulate limit of 0.035 lb/mmbtu was set based on the Prevention of Significant Deterioration (PSD) review. Therefore, the 0.035 particulate limit remains under the 52.21 citation in this permit, superceding the less stringent Subpart D and Part 227-1 limits. Because the boiler is not equipped with a continuous monitoring device for particulate emissions, a three hour opacity limit has been established as a surrogate under the Continuous Assurance Monitoring (40 CFR 64 CAM) requirements. In addition to the CAM opacity monitoring condition under 40 CFR 64 in this permit, RED is required to conduct periodic stack testing (once during permit term) to demonstrate compliance with the 0.035 lb/mmBtu limit.

Under paragraph 4 CFR 60.42(a)(2), Boiler 44 would be subject to opacity emissions limits. A condition is included in the permit under 6 NYCRR Part 227-1.3(a) which specifies the same limit and requires continuous emissions monitoring (COMs) to demonstrate compliance. Therefore, no separate Subpart D condition has been included.

**40 CFR 60.43 Standards for sulfur dioxide (SO2)**
Boiler 44 would be subject to to the SO2 limits for oil and coal combustion in under paragraphs 40 CFR 60-D.43(a)(1) and (a)(2) except that the limits included under 6 NYCRR Part 225 are more

stringent. Permit conditions including these more stringent limits can be found under 225-1.2(a) & (f).

**40 CFR 60.44 Standards for nitrogen oxides (NOx)**
Boiler 44 would be subject to to NOx limits for oil and coal combustion under paragraphs 40 CFR 60-D.44(a)(2) and (a)(3) except that more stringent limits and CEMS requirements are included under 6 NYCRR Subpart 227-2. Permit conditions specifying these more stringent limits can be found under 227-2.4(a)(1)(ii).

**40 CFR 60.45 Emissions and Fuel Monitoring**
Under this section of the rule, coal-fired Boiler 44 requires a continuous opacity monitoring (COMs) and continuous emissions monitoring (CEMs) for NOx. Boiler 44 is currently equipped with both COMs and NOx CEMs and is subject to the requirements for these systems and associated quarterly reporting under Subparts 227-1 and 227-2 conditions. No additional Subpart D conditions are necessary. If Boiler 44 is converted to natural gas and no.2 fuel oil, certain CEMS and COMs requirements under this section will no longer apply.

**40 CFR 60.46 Test Methods and procedures**
This secion requires the use EPA approved test methods and procedures for Subpart D sources. The use of these standard test methods is also required under Part 227 and no further permit conditions were included under Subpart D.

**40 CFR 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units**
**60.42b SO2 Standards**
**60.42b(k)(2)**
Units firing only very low sulfur oil, gas, or a mixture of these fuels with a potential SO2 emission rate less than 0.32 lb/mmBtu are exempt from the SO2 emission limits in this section. Based on the AP-42 factors, the equipment meets the exemption as follows:
Heat Recovery Steam Generators (HRSGs): 0.001 lb SO2 /mmbtu
New HP & MP boilers burning Natural Gas: 0.001 lb SO2/mmBtu
New HP & MP boilers burning distillate oil: 0.002 lb SO2/mmBtu
The condition under this citation requires that fuel receipts are kept which verify that only very low sulfur fuel is burned in these applicable boilers.

**60.43b Particulate/Opacity Standards**
**60.43b(f)**
RED operates new HP and MP dual-fueled boilers (ES 321BJ and 321BK) which are subject to the 20% opacity limit when firing oil. Because these boilers are also subject to the 227-1.3(a) opacity standard which is equivalent - or possibly more stringent because of the exceptions allowed under subdivision 60.43b(g) - the Subpart Db requirement has not been included in the permit.

**60.43b(h)(5)**
In accordance with this citation, RED's new oil-fired boilers are exempt from particulate standards of paragraph (h)(1) provided that they can demonstrate that they burn only oil containing no more than 0.30 weight percent sulfur. They are required to keep records to demonstrate that the oil they burn meets the very low sulfur specifications under the 60.42b(k)(2) condition of the permit.

**60.44b NOx Standards**
**60.44b(a)(1)**
The NOx limit for natural gas or distillate oil boilers depends on the boilers design heat input capacity and volume. Based on the determination that RED's proposed new HP gas-only boilers (ES

321BL and 321BM) are in the high heat release category, the limit would be 0.20 lb/mmbtu. Because this limit is less stringent than the Subpart 227-2 NOx limit of 0.08 lb/mmbtu, this Subpart Db limit was not included in the permit.

**60.44b(a)(4)**
Under this citation, Subpart Db specifies that the gas-fired duct burners on RED's heat recovery steam generators (HRSGs) (ES 321BE, 321BF and 321BG) meet a NOx limit of 0.2 lb/mmbtu and separate monitoring requirements. Though Subpart 227-2 does not specifically regulate duct burners, the combined HRSG/turbines are subject to a more stringent 0.02 lb/mmbtu limit which will be monitored via CEMS at the stack. The duct burners are vented along with the turbines to a stack and will not operate separately. Therefore, the less stringent Subpart Db limit for the duct burners has been omitted from the permit. An initial compliance demonstration shall be done by testing NOx emissions at the stack using the CEMs as allowed under paragraph 60.46b(f)(2).

**60.44b(l)(1)**
The NOx limit specified here for boilers contructed after 1997, burning coal, oil, or gas or a combination of these fuels applies to RED's new dual-fuel HP and MP boilers, ES 321BJ and 321BK. Based on the determination that these boilers are in the high heat release category, the limit would be 0.20 lb NOx/mmbtu. Since these boilers are more stringently regulated under the NOx limits of Supbart 227-2, this Subpart Db limit has not been included in the pemit.

**60.46b Compliance Methods for PM and NOx**
**60.46b(f)**
The monitoring condition included here specifies the initial performance test requirements to demonstrate compliance with the 0.20 lb/mmbtu NOx limits for the duct burners of these combined cycle systems. It is impossible to monitor emissions from the duct burners exclusively because the they must be operated in conjunction with the turbines with combined emissions to a common stack. Since RED is also subject to a 0.02 lb/mmbtu NOx RACT limit under Subpart 227-2 and must install a CEM to demonstrate compliance with this more stringent limit for each turbine/HRSG (with associated duct burner) unit, RED will opt, as allowed under paragrah (2) of this subdivision, to demonstrate compliance using the stack CEMS. This approach for a one-time compliance demonstration with the Subpart Db NOx limit, was discussed with EPA staff during several phone conversations and documented in a letter from RED to USEPA, dated May 29, 2015.

**60.48b Emission Monitoring for PM and NOx**
**60.48b(a)**
Subpart Db particulate monitoring requirements apply to RED's new boilers. Because RED meets the conditions for oil burning under paragraph (j)(2) of this section, they can choose to conduct Method 9 opacity testing upon start up of their new equipment instead of intalling a Continuous Opacity Monitor (COM). This requirement has not been included in the permit because the 227-1.3(a) requirement for COMs for the new oil-fired boilers is more stringent.

**60.48b(b)**
According to this requirement, RED's four new gas and oil-fired boilers would require NOx CEMs to demonstrate compliance with Subpart Db NOx standards under section 60.44b. However, these boilers are subject to more stringent NOx limits according to Subpart 227-2 requirements in this permit and corresponding 227-2 NOx CEMs requirements. Therefore, Subpart Db requirements for NOx CEMS monitoring under subdivisions 60.48b(b), (c), (d) or (e) have not been included.

**60.48b(h)**

According to this provision, RED's duct burners on their heat recovery steam generators (HRSGs) are exempt from NOx CEMs requirements. However, based on these units size, they are required to be equipped with NOx CEMS under Subpart 227-2.

**60.48b(j)**
RED is required to keep fuel purchase records to demonstrate compliance with the sulfur content limits specified here.

**60.48b(l)**
No additional monitoring is included under this citation. RED follows a site-specific fuel sampling and analysis plan under Part 227-1 to demonstrate compliance with sulfur-in-fuel requirements which are more stringent than the sulfur limits in Subpart Db. For opacity, specifically, the permit includes equivalent or more stringent monitoring requirements under Subpart 227-1 citations as well.

**60.49b Reporting and Recordkeeping Requirements**
**60.49b(a)**
As stated in RED's January 13, 2015 cover letter, the details included in their application for major modification of the Title V permit satisfy the requirement for start-up notification under 40 CFR 60.7.

**60.49b(b)**
RED is subject to NOx limits and NOx CEMs certification and monitoring requirements under Subpart 227-2 NOx RACT which are equivalent or more stringent to the Subpart Db requirements. Therefore, the NOx CEMs certifications for the new turbine/HRSGs and new HP and MP boilers are included under 227-2.6 citations.

**60.49b(d)**
A monitoring condition is included under this citation which requires that RED maintain records of fuel use and annual capacity factor, as defined in Subpart Db, for each applicable unit in accordance with paragraph 49b(d)(1).

**60.49b(f)**
RED's new boilers are subject to opacity standards while firing oil. These boilers are subject to equivalent or more stringent opacity monitoring requirements under Subpart 227-1. Therefore, no additional conditions have been included under this citation.

**60.49b(g)**
The condition included here specifies the records which need to be kept for RED's new boilers which require NOx CEMs. Additionally, the condition refers to the associated reporting requirement under subdivision 60.49b(i). Because Subpart 227-2 conditions in the permit require similar quarterly reporting for NOx, RED may opt to submit a single quarterly NOx report addressing the requirements of both rules.

**60.49b(h)**
The condition under this citation requires that excess emissions of NOx or opacity be reported. Because Subparts 227-1 and 227-2 conditions in the permit require similar quarterly reporting for excess emissions of NOx and opacity, RED may opt to combine these reports to address both rules.

**40 CFR 60 Subpart GG**
Although RED's three proposed gas-fired turbines (ES 321BE, 321BF, 321BG) are subject to Subpart GG requirements, under the following citations:

40 CFR 60-GG.332.(a)(2)
40 CFR 60-GG.333
40 CFR 60-GG.334(h)(3)
40 CFR 60-GG.334(i)(2)
40 CFR 60-GG.334(j)(1)
40 CFR 60-GG.334(j)(5)
40 CFR 60-GG.335(a),
no conditions have been included for Subpart GG because the turbines are more stringently regulated under Part 225 and Part 227 requirements. RED will burn natural gas only with minimal sulfur content.

The previously used turbines are subject to a calculated NOx limit of 156.4 ppmv @15% O2 under Subpart GG-40 CFR 60.332(a)(2) and have monitoring and performance testing obligations under 40 CFR 60.335. The gas turbines are subject to a case-by-case RACT determination under Subpart 227-2 which has resulted in a more stringent NOx limit of 0.02 lb/mmbtu and must install a CEMs to demonstrate compliance with this NOx RACT limit at the stack. It is impossible to monitor emissions from the turbines exclusively because the they must be operated in conjunction with the duct burners with combined emissions to a common stack. Therefore, RED will opt to use NOx data from the CEMS to demonstrate compliance with Subpart GG ppm limit as well. This approach has been discussed with EPA staff during several phone conversations and documented in a letter from RED to USEPA, dated May 29, 2015.

**40 CFR Part 61 National Emission Standards for Hazardous Air Pollutants (NESHAP)**
**40 CFR 61-A General Provisions**
Sets general requirements including preconstruction approval, monitoring, record keeping and reporting for operations subject to federal National Emission Standards for Hazardous Air Pollutants (NESHAPS).

**40 CFR 61-E Mercury NESHAP**
**40 CFR 61-E.52(b)**
According to this citation, mercury emissions from RED's wastewater sludge treatment (Multiple Hearth Incinerator (MHI) ES 095AF) are limited to 3200 grams per 24 hr period. This limit was omitted from the permit because the MHI has a much more stringent mercury feedrate limit under the MACT rule (40 CFR 63 Subpart EEE) of 33 grams per 12 hour period. Compliance is monitored with routine sludge sampling and sludge feed rate limits included under the MACT citations.

**40 CFR 61-E.55(a)**
Under this citation, RED would be required to monitor mercury emissions from the wastewater sludge incinerator (MHI) annually if they emitted more than 1,600 grams/24 hour period. This requirement was omitted from the permit because the MACT limitations for mercury included under Subpart EEE conditions of this permit are much more stringent. Based on recent sludge sample results, the MHI has a current feed of mercury into the incinerator of about 32 grams/ 24 hr period assuming maximum allowable sludge feed rate. By complying with the MACT feedrate limits, RED would not come close to exceeding this threshold and any changes in operation that could increase mercury feedrate levels would require major modification of the permit.

**40 CFR 61- Subpart FF Benzene Waste Operations NESHAP**
**40 CFR 61-FF.342(a)**
This condition outlines the requirements for chemical manufacturing plants, coke byproduct recovery plants and petroleum refineries to show that they manage less than 10 megagrams (Mg) per year of benzene from facility waste. Staying below this threshold exempts the RED facility from the substantive requirements of the Benzene Recovery NESHAP. To demonstrate compliance with the annual 10 Mg limit, the rule specifies a calculation methodology relying on data collected on an annual basis.

Therefore, the permit specifies a calculation of annual total benzene waste for demonstration of compliance with the 10 Mg limit. The facility's annual total of benzene waste subject to this rule has historically been well below 1 Mg per year. In addition to the 10 Mg/year limit, the permit condition requires that the calculation of total annual benzene be repeated whenever there is a change in the process generating the waste that could cause the quantity to increase to 1 Mg/yr or more. Additional conditions in the permit (see Subpart FF citations below) provide further assurance that accurate records are kept and notification to the agencies would occur if the quantity of benzene wastes approached the applicability threshold. Because of the historically low quantities of benzene waste at Eastman Business Park and the annual data collection specified by the rule itself, the annual calculation demonstration required by the permit is sufficient.

**40 CFR 61-FF.356(b)(1)**
This condition specifies on-going record keeping requirements for the identification of waste streams subject to Subpart FF and the detailed information necessary to determine applicability (ie: benzene content).

**40 CFR 61-FF.357(a)**
This condition established the requirements for the initial report on the regulatory status of each benzene-containing waste stream. This is a past requirement.

**40 CFR 61-FF.357(b)**
The condition under this ciation requires reporting of waste stream changes that could cause the total annual benzene emissions from the facility to exceed the 1 Mg/yr threshold.

**40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories**
**40 CFR 63-A General Provisions**
RED operates sources subject to Subpart 40 CFR 63 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-A.6(i)(4)(i)('A')**
Under this citation, a facility level condition has been included in the permit which documents EPA's approval of a one year extension granted to RED for compliance with the Industrial, Commercial and Industrial Boiler and Process Heater MACT (40 CFR 63 Subpart DDDDD) requirements. The extension allows RED until January 31, 2017 to either shut down the existing applicable equipment or comply with the MACT rule. The condition also requires RED to submit quarterly progress reports as specified in EPA's April 1, 2015 approval letter.

**40 CFR 63-DD Offsite Waste NESHAP**
**40 CFR 63-DD.680(f)**
This condition states that where RED uses control equipment to comply with the emission limit, like at the Multiple Hearth Incinerator (MHI), they must maintain a startup, shutdown and malfunction (SSM) plan.

**40 CFR 63-DD.683(b)(2)(ii)**
RED may accept wastewater containing HAPs from off-site for treatment at their King's Landing wastewater treatment plant (EU U-00008). The Off-Site Waste MACT rule provides an exemption for facilities that receive less than one (1) megagram of HAP per year in off-site waste in accordance with the

provisions of this citation. A monitoring condition has been included to describe the requirements to identify the exempt units and document HAP containing wastes from off-site.

**40 CFR 63- EEE Hazardous Waste Combustors NESHAP**
RED's Multiple Hearth Incinerator (MHI) at Bldg 95 at Eastman Business Park is subject to the requirements of the MACT for Hazardous Waste Combustors.

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

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

**40 CFR 63.1209 Monitoring Requirements**
**40CFR 63.1209(a)**
A condition has been included at 1209(a)(2) to address requirements for operating and calibrating the CO and oxygen CEMS in accordance with Performance Specification 4Bin Appendix B of Part 60. No condition has been included for 1209(a)(1) because the requirement to continuously monitor CO and oxygen using a CEMs is already included in the CO monitoring condition cited at 1203.

**40 CFR 63.1209(b)**
A condition has been included at 1209(b) which states the requirements for operating and calibrating the non-CEMS Continuous Monitoring Systems (CMS), including frequency of calibration of thermocouples

**40 CFR 63.1209(c)(2)**
A condition has been included which specifies the requirements for a Feedstream Analysis Plan.

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

Secondary Combustion Chamber (SCC) temperature; 7) maximum rabble arm speed; and 8) minimum secondary specific power to the WESP.

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

**40 CFR 63.1209 (j) Destruction & Removal Efficiency (DRE)**
See permit conditions cited under 1209(m)(1)(i)(C) to monitor the maximum stack gas air flow rate through the system. See permit conditions cited under 1209(k)(2) for monitoring of minimum combustion chamber temperatures and the condition cited under paragraph (k)(4) for monitoring total sludge feed rate.

**40 CFR 63.1209 (k) dioxins and furans**
**40 CFR 63.1209(k)(2)**
Under this citation, two monitoring conditions require monitoring of minimum combustion chamber temperature in each of the combustion chambers: 1) the #3 and #4 Hearths, and 2) the Secondary Combustion Chamber (SCC). These monitoring locations best represent the bulk gas temperature in the combustion zones. These conditions also satisfy the requirement for monitoring minimum temperature under paragraph1209(j)(1) for DRE.

**40 CFR 63.1209(k)(3)**
See condition for monitoring maximum stack gas air flow rate cited under 1209(m)(1)(i)(C).

**40 CFR 63.1209(k)(4)**
One condition is included to require monitoring the maximum hazardous waste feedrate (sludge, grit & debris) to the MHI. This condition also satisfies paragraph (j)(3) of this section.

**40 CFR 63.1209(l) Mercury**
**40 CFR 63.1209(l)(1)**
A condition is included to monitor the maximum feed rate of mercury in the waste stream.

**40 CFR 63.1209(l)(2)**
A condition is included to monitor the minumum feed water pressure to the Condenser. This satisfies the requirement at 1209(l)(2), as well as (o)(3)(iii), for combustors equipped with wet scrubbers. See also the monitoring conditions for minimum water flow rate to the venturi scrubber cited at 1209(m)(1)(i)(C).

**40 CFR 63.1209(m) Particulates**
**40 CFR 63.1209(m)(1)**
There are five conditions included to specify operating parameter limits for the control devices aimed at removing particulate emissions from the gas stream. The venturi scrubber is considered a high energy scrubber subject to the requirement to monitor a minimum pressure drop across the scrubber (1209(m)(1)(i)(A)). In addition to this citation, the condition for minimum pressure drop across the venturi satisfies requirements of paragraphs 1209(l)(2), (n)(3), and (o)(3)(i) for control of mercury, metals and HCl, respectively. Additionally, the minimum venturi blowdown and minimum liquid level in the recycle tank are required per 1209(m)(1)(i)(B)(1) as well as under paragraph 1209(n)(3) for metals. A condition to monitor the minimum water flow rate to the venturi scrubber is cited at 1209(m)(1)(i)(C) which also satisfies requirements cited under paragraphs 1209(l)(2), (o)(2), and (n)(5). The requirement

to monitor the maximum stack gas air flow rate is specified in several other paragraphs of the rule: 1209(k)(3), (j)(2), (n)(5), and (o)(2); but is included in the permit under the 1209(m)(1)(i)(C) citation.

**40 CFR 63.1209(m)(3)**
A condition is included to monitor the maximum ash feed rate on a 12 hour average basis as specified in the rule. The limit was established based on the test run averages, extrapolated by 30% as allowed by EPA's 9/22/03 alternative monitoring petition approval: average ash feed 1200 lb/hr x 12 hr x 1.3 (30% extrapolation) = 18,720 lb/12 hr limit.

**40 CFR 63.1209(n) Semi-Volatile and Low-Volatile Metals**
Conditions limiting the feedrate of semi-volatile and low-volatile metals on a 12-hour average basis are included under 1209(n)(2). These limits are based on data collected during the comprehensive performance testing. The low-volatile metal limit is based on a 30% extrapolation of the test data as allowed under paragraph (n)(2)(vii). See conditions cited under 1209(m) for control of particulate emissions which also satisfy the requirements of 1209(n)(3) and (n)(5).

**40 CFR 63.1209(o) Hydrogen Chloride and Chlorine gas**
**40 CFR 63.1209(o)(1)**
A condition is included to limit the maximum total feed rate of chlorine on a 12-hour average basis. This condition satisfies the requirement to limit the total chlorine feed rate for minimizing metal emissions under 1209(n)(4) as well.

**40 CFR 63. 1209(o)(2)**
See conditions cited under 1209(m)(1)(i)(C) for control of particulate emissions which also satisfy the requirements of 1209(o)(2).

**40 CFR 63.1209(o)(3)(ii)**
A monitoring condition is included for monitoring pressure drop across the Condenser/Absorber as required by paragraph 1209(o)(3)(ii) for low-energy set scrubbers. This monitoring condition does not include an Automatic Waste Feed Cutoff (AWFCO) based on USEPA's September 22, 2003 approval of an alternative monitoring petition which specifies an alarm only, followed by necessary corrective action. The lower pressure drop limits at stack gas flowrates less than 8863 acfm are based on a December 29, 2005 alternative monitoring petition approval. Additionally, monitoring requirements for pH and solids content, specified at 63.1209(o)(3)(iv) and 63.1209(m)(1)(i)(B), were waived by USEPA's August 27, 2001 approval of an alternative monitoring petition. This condition also satisfies requirements for monitoring the Condenser/Absorber under paragraphs (m)(1)(i)(B)(1) and (l)(2) for particulate and mercury control.

**40 CFR 63.1209(o)(3)(iii)**
See monitoring condition cited at 1209(l)(2).

**40 CFR 63.1209(o)(3)(iv)**
A condition to monitor the minimum pH of the venturi blowdown is included under this citation. A pH limit of 5.4 in the previous permit was established based on Kodak's February 13, 2009 alternative monitoring petition which was approved by EPA. This variance approval also specified a pH advisory level of 5.69. The alternative monitoring limit was effective until new test data became available. Following the more recent 2013 CPT results, RED submitted another alternative monitoring request to EPA, dated December 10, 2014, to continue the 5.4 pH limit. In a May 21, 2015 letter, USEPA approved the continued use of the alternative limit on the minimum pH. Therefore, the 5.4 pH limit with the 5.69 advisory level has been renewed in this version of the permit.

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

A condition to monitor the minimum Condenser/Absorber feed water flow rate is included which satisfies the requirement at paragraph (l)(2) of this section as well as (o)(3)(v).

**40 CFR 63.1211**
Condition have been included at the facility level for 63.1211(a) and at the emission unit level (EU U-00008) for 63.1211(b) reporting requirements. These conditions detail the requirements to submit a Summary and SSMP Report on a semiannual basis.

**40 CFR 63.1219(a)**
A permit condition has been included under this citation to state the requirement for the MHI to maintain a 99.99% destruction and removal efficiency in order to meet the seven emission standards for: Carbon Monoxide, Low-Volatile Metals, HCl and chlorine, Semi-Volatile Metals, Dioxins and Furans, Particulate, and Mercury. For each standard a compliance test is required once during the term of the permit. Operating limits established during testing are specified under separate permit conditions in this permit.

A second condition under this citation specifies the continuous emission monitoring (CEMs) requirements to demonstrate compliance with the 100 ppm carbon monoxide (CO) limit at the Multiple Hearth Incinerator (MHI). RED chooses to comply with the CO emission limit according the requirements of 63.1219(a)(5)(i), rather than the hydrocarbon limit in subdivision (5)(ii). The CEMs requirements in 63.1209(a)(1) and (2) are also addressed by this condition. **Note that EPA granted a waiver of the annual RATA for the Carbon Monoxide (CO) CEMS on the MHI. EPA's letter to Kodak, dated June 20, 2003, states that the facility shall instead conduct an annual CEMS status check, following the manufacturer's instructions and in accordance with 40 CFR 60 Appendix B Performance Specifications 4B Section 7.3. The CEMS status check must include all applicable items listed in this section, including calibration error and calibration drift determinations. Because there have been no modifications to this system upon transfer of the facility to RED-Rochester, this approval is still valid provided that RED continues to meet the criteria in the Performance Standard for approval of this option and so long as the CO concentration at the time that the RATA would be scheduled is less than 10 ppm (actual concentration, not corrected).

**40 CFR 63- YYYY Stationary Combustion Turbines NESHAP**

As part of the powerhouse conversion project, RED proposes to operates three (3) natural gas-fueled combustion turbines (ES 321 BA, 321BB and 321BC) which will be relocated to the EBP. The construction date of these turbines was prior to January 14, 2003 and so they are considered existing stationary combustion turbines. In accordance with paragraph 63.6090(b0(4), "Existing stationary combustion turbines in all subcategories do not have to meet the requirements of this subpart and of subpart A of this part. No initial notification is necessary for any existing stationary combustion turbine, even if a new or reconstructed turbine in the same category would require an initial notification". Therefore, no Subpart YYYY requirements are included in this permit.

**40 CFR 63- ZZZZ Reciprocating Internal Combustion Engines NESHAP**
RED is a major source of HAPs subject to the emission limitations and operating limits for hazardous air pollutants (HAPs) emitted from stationary reciprocating internal combustion engines (RICE). Specifically, RED is considered an existing major source operating emergency generoatrs: Bldg 311 669 BHP diesel fueled fire pump and Bldg 602 227 BHP diesel fueled fire pump. New York State has not accpeted delegation of this rule. A general facility-level condition for the RICE rule is included in this

permit to address these requirements. RED will create a matrix of requirements that apply to its emergency generators.

**40 CFR 63, Subpart DDDDD Industrial, Commercial and Institutional Boiler and Process Heaters**
Requirements of this MACT rule will apply to RED's existing and proposed new boilers.

**40 CFR 63.7495(a)**
The MACT rule will apply to RED's proposed new boilers (ES 321BJ, 321BK, 321BL and 321BM) under Process K23 and K24 upon start-up.

**40 CFR 63.7495(b)**
For existing sources, the compliance date in the rule is January 31, 2016. The condition under this citation references the Section 63.6(i) for exceptions to the compliance date. RED's existing boilers have been granted a one year extension of the compliance date by USEPA. A separate condition under 40 CFR 63-A.6(i)(4)(i)('A') (see above) documents the extended January 31, 2017 compliance deadline.

**40 CFR 63.7500(a)**
Conditions under paragraphs 63.7500(a)(1) and (a)(2) include emission limits and work practice requirements from Tables 1-4 of the rule. Tables 11-13 provide alternative emission limits. The proposed gas-only boilers are applicable to work practice standards in Table 3, but not applicable to requirements of Tables 1, 2 & 4 per 63.7500(e).

Solid Fuel Boiler MACT emission limits and requirements apply to Process K16, coal combustion in Boiler #44 (emission source 321AJ > 250 mmbtu/hr) combusting coal and No. 2 Fuel Oil

Light Liquid Fuel Boiler MACT emission limits and requirements apply to Process K14, No. 2 Fuel Oil combustion in Boiler #44 (emission source 321AJ > 250 mmbtu/hr) combusting No. 2 Fuel Oil and Natural Gas

Light Liquid Fuel Boiler MACT emission limits and requirements apply to Process K23, No. 2 Fuel Oil combustion in HP Dual Fueled Boiler #1 (emission source 321BJ > 250 mmbtu/hr) combusting No. 2 Fuel Oil and Natural Gas and MP Dual Fueled Boiler #1 (emission source 321BK > 250 mmbtu/hr) combusting No. 2 Fuel Oil and Natural Gas.

Gas 1 Boiler MACT emission limits and requirements apply to Process K24, Natural Gas combustion in:
HP Dual Fueled Boiler #1 (emission source 321BJ > 250 mmbtu/hr) combusting Natural Gas and < 48 hours of No. 2 Fuel Oil,
MP Dual Fueled Boiler #1 (emission source 321BK > 250 mmbtu/hr) combusting Natural Gas and < 48 hours of No. 2 Fuel Oil,
HP NG-only Boilers #1(emission source 321BL > 250 mmbtu/hr) combusting natural gas only, and
HP NG-only Boiler #2 (emission source 321BM> 250 mmbtu/hr) combusint natural gas only.

**40 CFR 63.7500(c)**
This condition applies to Boiler 43 (ES 321AI) which would be operated as a limited use boiler (10% annual capacity or less on coal) under Scenario 2 only. The limited use boiler would be subject to tune up requirement every 5 years, but is not subject to the emission limits in Tables 1 and 2 or 11 through 13, the annual tune-up, or the energy assessment requirements in Table 3, or the operating limits in Table 4.

**40 CFR 63.7515**

Annual performance tess are required for coal boiler # 44 (Process K16). Boilers burning natural gas or oil (Processes K14, K23, K24) have only a one-time performance test rather than annual testing per 63.7515(h), provided that Ultra Low Sulfur Diesel is being used.

Based on RED's proposal to use continuous O2 trim systems, boiler tune-ups will be required once every 5 years as specified under 63.7540(a)(12).

A condition under subdivision (e) of this section, states the requirements and allowances for monthly fuel analyses.

**40 CFR 63.7520**
Conditions under this citation specify the requirements for conducting stack tests.

**40 CFR 63.7521(a)**
Conditions under this citation specify the fuel analysis requirements for solid and liquid fuels.

**40 CFR 63.7525(a)**
Conditions under this citation specify the oxygen analyzer monitoring system requirements.

**40 CFR 63.7525(b)**
The condition under this citation specifies the requirements for continuous parametric monitoring system (CPMS) for particulate emissions for the coal boiler (Process K16).

**40 CFR 63.7525(e)**
The condition under this citation specifies the requirements for monitoring flow where required to demonstrate compliance with the operating limits for coal combustion (Process K16).

**40 CFR 63.7525(f)**
The condition under this citation specifies the requirements for pressure monitoring for coal combustion (Process K16). No pressure monitoring is required for the light liquid fuel subcategory.

**40 CFR 63.7525(g)**
The condition under this citation specifies the requirements for pH monitoring system for the coal boiler (Process K16). No pH monitoring is required for the light liquid fuel subcategory.

**40 CFR 63.7525(h)**
No ESP is required for oil boilers and no ESP would be required for the coal boiler when Particulate CPMS is required.

**40 CFR 63.7525(i)**
If RED uses a sorbent inject system to comply with HCl requirements on the coal boiler (Process K16), the requirements of this subdivision regarding the measurement of total sorbent injection rate would apply.

**40 CFR 63.7525(k)**
The condition under this citation states that for limited use Boiler #43 (ES 321AI) under Scenario 2 only, RED must keep records of the days of operation.

**40 CFR 63.7525(l)**

Conditions under this citation specify the requirements in case that a CEMS is used to demonstrate compliance with the HCl and Mercury limits.

**40 CFR 63.7525(m)**
The condition under this citation specifies the requirements for an SO2 CEMs in the case that RED uses dry sorbent injection for compliance with the HCl limit at the coal boiler (Process K16).

**40 CFR 63.7530(a)**
Conditions under this citation specify the requirements for inital compliance demonstration through a performance test and fuel analyis to establish operating limits.

**40 CFR 63.7530(b)**
Conditions under this citation specify the requirements for establishing all site specific operating parameters that apply based on performance testing.

**40 CFR 63.7530(c)**
Conditions under this citation specify the procedures to conducting fuel analyses to demonstrate compliance.

**40 CFR 63.7530(d)**
The condition under this citation requires certification that a tune up was conducted for the natural gas boilers.

**40 CFR 63.7530(e)**
The condition under this citation requires the certification of the energy assessment for existing boiler #44 (ES 321AJ).

**40 CFR 63.7530(h)**
The condition under this citation specifies work practice requirements for the oil and coal boilers. RED's gas units are exempt from Tables 1 & 2, but not exempt from Table 3.

**40 CFR 63.7535**
The condition under this citation specify the minimum data collection requirements applicable to the oil and coal units.

**40 CFR 63.7540(a)**
The conditions under this citation reference the prescribed methods for demonstrating continuous compliance with emission limits fo rthe fuel oil and coal units.

**40 CFR 63.7550(d)**
The conditions under this citation specify the requirements for reporting deviations of monitoring requirements for which the facility does not use Continuous Monitoring Systems (CMS) to comply with the emission limits.

**40 CFR 63.7550(e)**
The conditions under this citation specify the requirements for reporting deviations of monitoring requirements for which the facility uses Continuous Monitoring Systems (CMS) to comply with the emission limits.

**40 CFR 63.7550(h)**
The conditions under this citation states the procedures for reporting.

**40 CFR 63.7555**
Conditions under subdivisions 63.7555(a) - (d), (i) and (j) of this section state record keeping requirements from the rule.

**40 CFR 63.7560**
The condition under this citation states records assessibility and retention requirements.

**40 CFR 64 Compliance Assurance Monitoring (CAM)**
Permit conditions have been included which reflect the approved CAM Plan for Boilers 42, 43 & 44. RED's coal fired boilers are subject to the CAM rule with respect to Part 227-1 particulate emission limits. As explained in the CAM Plan, opacity is measured by using a continuous monitoring system (COM) and used as a surrogate indicator for compliance with particulate standards for each of the large coal boilers. Particulate testing was done concurrently with opacity monitoring to determine the 3 hour opacity limit which corresponds to a compliant particulate emission level.

Under Kodak's previous ownership of the boilers, applicability to CAM occurred in stages beginning with a permit modification that involved Boilers 42 and 43, and later incorporating Boilers 41 and 44 upon permit renewal. Testing to establish the initial CAM limits on Boilers 42 and 43 was completed in 2007. And testing to establish initial CAM limits for Boiler 41 and 44 were completed in June 2009 and November 2009. Based on these tests, a three-hour average opacity limit was established. The condition for each of these boilers states the opacity limit and defines an excursion and describes the operators obligations in the case of an excursion, and states record keeping and reporting requirements under CAM. Since Boiler 41 has been shut down, the conditions for the remaining boiler CAM limits are included in RED's permit.

Testing to re-establish the CAM opacity limits is required once during each Title V Permit term. In April 2015, RED submitted a test protocol to conduct testing on the three coal fired boilers for testing planned for late May.

**40 CFR 64.4**
Justification of the proposed CAM, required under paragraph 64.4(b), and past test data and associated documentation used to support the proposed monitoring, required under 64.4(c), were provided as part of Kodak's first renewal application and are included below for those Emission Units which were transferred to RED-Rochester. Where CAM applicability may not be self-evident, a brief applicability analyses and conclusions for units, pollutants and standard combinations for which Kodak concluded that CAM does not apply is also included below.

**U-00008**
**EP 09503 – Multiple Hearth Incinerator 212.4(b) – Particulate standard**
The Multiple Hearth Incinerator (MHI) is subject to requirements contained in the Hazardous Waste Combustor MACT 40 CFR 63 Subpart EEE. As part of these requirements Comprehensive Performance Tests (CPT) are conducted to demonstrate the ability of the incinerator to meet the HWC emission limits. Subsequent to the most recent CPT, a Revised Notice of Compliance (NOC), dated January 5, 2015 was submitted and approved by the NYSDEC. The NOC included the monitoring requirements necessary to comply with the particulate limits. CAM for 6 NYCRR Part 212.4(b) will be satisfied by monitoring the following parameters as identified in the MHI NOC:

1. Water flow rate to the condenser (Control Device 09507);

2. Feed of wastewater sludge, grit, and debris to the Multiple Hearth Incinerator (Emission Source 095AF);
3. Venturi scrubber (Control Device 09509) blowdown rate;
4. Water flow rate to the quench chamber (Control Device 09506);
5. Stack gas air flow rate through the Multiple Hearth Incinerator (Emission Source 095AF);
6. Secondary specific power supplied to the wet electrostatic precipitator (WESP) (Control Device 09511);
7. Water flow rates to the venturi scrubber approach and throat (Control Device 09509);
8. Pressure drop across the venturi scrubber (Control Device 09509);
9. Condenser (Control Device 09507) water pressure;
10. WESP KVA (Control Device 09511); and
11. Ash feed rate to the Multiple Hearth Incinerator (Emission Source 095AF)

The indicator ranges for the parameters will be consistent with the limits provided in the NOC.
RED must comply with the Emergency Safety Vent provisions in 40 CFR 63.1206(c)(4).

Under 64.4(b)(4), monitoring conducted for “standards exempt from this part” is presumptively acceptable to the extent that the monitoring is “applicable to the performance of the control device. . .for the pollutant-specific emissions unit”. The proposed monitoring approach relies on monitoring performed to meet 40 CFR 63 Subpart EEE (a standard exempt from CAM) and is relevant to assessing the ability of the control devices to control particulate emissions from the multiple hearth. As such, the proposed monitoring is presumptively acceptable and satisfies CAM.

**U-00008**
**EP R1601 and R1602 - Wet scrubbers 212.10(c)(4)(iii) VOC RACT**
The wet scrubber system was designed to control emissions from the trickling filters, sludge dewatering ("belt press room"), and sludge holding tanks. It is used infrequently and limited to operation during periods of high organic loadings to the KLWPP wastewater treatment plant. The primary function of the wet scrubber system is odor control, however a nominal level of VOC control (generally <5%) is realized for the exhausts from the trickling filters, belt press room, and holding tanks. This control efficiency has historically been relied in the emissions calculation associated with the VOC RACT cap associated with the trickling filters. To optimize the VOC control efficiency a minimum 10 gallon per minute scrubber water blowdown rate is used to ensure the quality of the water in the scrubber system. Process modeling (see 4/18/95 letter from Donna Hendricks, P.E., Kodak to Thomas Marriott, P.E., NYSDEC Region 8) has demonstrated that the control requirements can be met with this blowdown rate.

**U-00008**
**EP 09508 HEPA Filter on Central Vacuum 212.4(c) Particulate**
The central vacuum system is used infrequently for cleaning solids (ex. fugitive ash) within Bldg 95. Differential pressure readings are used to continuously monitor the pressure drop across the HEPA filter to ensure particulate emission standards are met and are appropriate to satisfy the CAM monitoring criteria. The indicator range of 0.1 to 5.0 inches of water is based on manufacturer’s recommendation in this type of application. A pressure drop below this indicator range may indicate the presence of a tear in the HEPA filter; whereas, a pressure drop above this range is indicative that the HEPA filter may need to be changed.

**40 CFR 64.7**
This condition states the requirements for operating within the CAM requirements, including proper maintenance, data collection, and response and documentation of excursions.

**40 CFR 64.8**

This condition states that the if a facility has repeated problems complying with a CAM requirement, the Administrator may require the owner or operator to develop and implement a Quality Improvement Plan (QIP). Details of the QIP requirement are included in the rule at 64.8, but were not incorporated into the Renewal permit because no QIP has been required yet.

**40 CFR 64.9**
This condition states the Reporting and Record Keeping requirements for CAM.