



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 8-2699-00126/00001
10/21/2016

Facility Identification Data

Name: RED-ROCHESTER LLC AT EASTMAN BUSINESS PARK
Address: EASTMAN BUSINESS PARK UTILITIES|WATER, POWER, WASTEWATER
ROCHESTER, NY 14650-0001

Owner/Firm

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

Permit Contacts

Division of Environmental Permits:

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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



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plan to replace the powerhouse's current combustion infrastructure, referred to as emission unit U-00015 in the permit, with one natural gas fired turbine, one heat recovery steam generating unit, three natural gas fired high pressure boilers, one dual fired medium pressure boiler and conversion of the existing pulverized coal fired boiler #44 to natural gas. Existing coal fired boilers #42 and #43 are to be phased out and decommissioned.

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, 321 and proposed building 371 housing the new natural gas fired boilers, gas fired turbine/HRSH and their associated fuel oil storage, coal and ash conveyance, and boiler water operations; Kings Landing wastewater treatment operations, including the Bldg 95 Multiple Hearth Incinerator (MHI); solvent metal parts cleaners; and other stationary combustion sources and emergency 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).



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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 U00015 - Building 31, 321 and 371 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.

Emission unit U00015 is associated with the following emission points (EP):

00001, 00003, 00004, 321A0, HPNG1, HPNG2, HPNG3, MPDF1, PGT01

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 Boiler 42 rated at 500 mmbtu/hr and Boiler 43 rated at 640 mmbtu/hr.

Process: K13 is located at Building 321 - Bituminous coal combustion for built-up Boiler 42 rated at 500 mmbtu/hr and Boiler 43 rated at 640 mmbtu/hr.

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 rated at 655 mmbtu/hr Pre-5D MACT Deadline.

Process: K16 is located at Building 321 - Coal combustion in Boiler #44 rated at 655 mmbtu/hr Post-5D MACT Deadline.

Process: K20 is located at Building 321 - Natural gas combustion in boiler #44 rated at 694 mmbtu/hr Post-5D MACT Deadline.

Process: K21 is located at Building 371 - Natural gas combustion in turbine (321BA) rated at 50 Megawatt with #2 fuel oil backup.

Process: K22 is located at Building 371 - Natural gas combustion in heat recovery steam generating unit (HRSG).

Process: K23 is located at Building 371 - No. 2 fuel oil combustion at 264 mmbtu/hr in the medium pressure dual fueled boiler, Post-5D MACT Deadline.

Process: K24 is located at Building 371 - Natural gas combustion in high pressure gas-only boilers rated at



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370 mmbtu/hr and medium pressure dual fueled boiler firing natural gas at 264 mmbtu/hr.

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. NOTE: No requirements for this alternative equipment are included in the permit at this time.

Process: K27 is located at Building 321 - Natural gas combustion in high pressure gas-only and high and medium pressure dual fueled boilers < 250 MMBtu/hr, Post-5D MACT Deadline. NOTE: No requirements for this alternative equipment are included in the permit at this time.

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

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.



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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 construction or reconstruction before June 12, 2006

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:
 The facility is a major source of emissions for NOx, CO, SO2, Particulates and VOC.

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)	YES
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



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PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - 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 231-5, 231-6) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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.

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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 INDUSTRIAL BOILER - SUBBITUMINOUS COAL Pulverized Coal: Dry Bottom
1-02-002-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - SUBBITUMINOUS COAL Cyclone Furnace
1-02-004-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL Grade 6 Oil
1-02-004-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL <10MMBTU/HR **
1-02-005-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL Grades 1 and 2 Oil
1-02-005-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL 10-100MMBTU/HR **
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-02-006-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Less Than 10 MMBtu/Hr
2-01-001-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Reciprocating
2-01-002-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS Reciprocating
3-01-820-02	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - WASTEWATER AGGREGATE



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3-05-101-99	WASTEWATER TREATMENT MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS CONVEYORS Other Not Classified
3-16-130-02	PHOTOGRAPHIC PRODUCT MANUFACTURING STORAGE OPERATIONS GENERAL STORAGE OPERATIONS
4-01-003-36	ORGANIC SOLVENT EVAPORATION COLD SOLVENT CLEANING/STRIPPING Entire Unit
5-03-005-06	SOLID WASTE DISPOSAL - INDUSTRIAL SOLID WASTE DISPOSAL: INDUSTRIAL - INCINERATION 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 for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000092-52-4	1, 1 BIPHENYL		10		
000060-29-7	1,1'-OXYBIS-ETHANE		2.5		
003268-87-9	1,2,3,4,6,7,8,9-OCTACHLORODIBENZODIOXIN		2.5		
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER		10		
000107-06-2	1,2-DICHLOROETHANE		10		
000106-99-0	1,3-BUTADIENE		10		
000497-26-7	1,3-DIOXOLANE,2-METHYL-		2.5		
000123-91-1	1,4-DIETHYLENE DIOXIDE		10		
000872-50-4	1-METHYL-2-PYRROLIDONE		2.5		
000098-86-2	1-		10		



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	PHENYLETHANO NE	
001746-01-6	2,3,7,8- TETRACHLOROD IBENZO-P- DIOXIN	10
000105-67-9	2,4 XYLENOL	2.5
000121-14-2	2,4, DINITRO TOLUENE	10
000606-20-2	2,6- DINITROTOLUEN E	2.5
000088-04-0	2-CHLORO-5- HYDROXY-1,3- DIMETHYLBENZ ENE	2.5
000078-59-1	2-CYCLOHEXEN- 1-ONE,3,5,5- TRIMETHYL	10
000109-86-4	2- METHOXYETHA NOL	10
000091-57-6	2-METHYL NAPHTHALENE	10
000108-10-1	2-PENTANONE, 4- METHYL	10
000080-62-6	2-PROPENOIC ACID, 2-METHYL- , METHYL ESTER	10
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER	10
000096-33-3	2-PROPENOIC ACID, METHYL ESTER	2.5
000056-49-5	3- METHYLCHOLA NTHRENE	2.5
000085-60-9	4,4'-BUTYLIDENE BIS[6-TERT- BUTYL-3- METHYLPHENOL]	2.5
0NY507-00-0	40 CFR 63 SUBPART DDDDD TOTAL SELECTED METALS	2.5
003697-24-3	5-METHYL CHRYSENE	2.5
000083-32-9	ACENAPHTHENE	10
000208-96-8	ACENAPHTHYLE NE	2.5
000075-07-0	ACETALDEHYDE	10
000108-05-4	ACETIC ACID ETHENYL ESTER	10
000075-05-8	ACETONITRILE	10
000107-02-8	ACROLEIN	10
069418-26-4	ACRYL-(2- ACRYLOXYETHY L)TRIMETHYLAM MONIUM CHLORIDE COPOLMER	75000
000532-27-4	ALPHA-	10



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	CHLOROACETOP HENONE	
000062-53-3	ANILINE	10
000120-12-7	ANTHRACENE	10
007440-36-0	ANTIMONY	10
007440-38-2	ARSENIC	10
007440-39-3	BARIUM	2.5
000121-69-7	BENZENAMINE, N, N-DIMETHYL	10
000071-43-2	BENZENE	10
000098-82-8	BENZENE, (1- METHYLETHYL)	10
000095-47-6	BENZENE, 1,2- DIMETHYL	10
000056-55-3	BENZO(A)ANTHR ACENE	10
000050-32-8	BENZO(A)PYREN E	10
000205-99-2	BENZO[B]FLUOR ANTHENE	10
000191-24-2	BENZO[G,H,I]PER YLENE	10
000205-82-3	BENZO[J]FLUOR ANTHENE	2.5
000207-08-9	BENZO[K]FLUOR ANTHENE	10
000100-44-7	BENZYL CHLORIDE	10
007440-41-7	BERYLLIUM	10
000117-81-7	BIS(2- ETHYLHEXYL) PHTHALATE	10
000075-25-2	BROMOFORM	10
000106-97-8	BUTANE	2.5
000071-36-3	BUTANOL	100
007440-43-9	CADMIUM	10
000124-38-9	CARBON DIOXIDE	75000
000075-15-0	CARBON DISULFIDE	10
000630-08-0	CARBON MONOXIDE	75000
007782-50-5	CHLORINE	10
007791-21-1	CHLORINE OXIDE CL ₂ O	100
000108-90-7	CHLOROBENZEN E	10
000067-66-3	CHLOROFORM	10
007440-47-3	CHROMIUM	10
018540-29-9	CHROMIUM(VI)	10
000218-01-9	CHRYSENE	10
007440-48-4	COBALT	10
007440-50-8	COPPER	2.5
001319-77-3	CRESYLIC ACID	10
000057-12-5	CYANIDE	10
000108-91-8	CYCLOHEXANA MINE	10
000110-82-7	CYCLOHEXANE	75000
000053-70-3	DIBENZ[A,H]ANT HRACENE	10
000132-64-9	DIBENZOFURAN	10
025321-22-6	DICHLOROBENZ ENE	2.5
000075-09-2	DICHLOROMETH ANE	10



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000120-83-2	DICHLOROPHEN OL, 2,4	2.5
000067-64-1	DIMETHYL KETONE	75000
000120-61-6	DIMETHYLTEREP HTHALATE	2.5
064742-47-8	DISTILLATES (PETROLEUM), HYDROTREATED LIGHT	75000
000074-84-0	ETHANE	2.5
000071-55-6	ETHANE, 1,1,1- TRICHLORO	10
000079-00-5	ETHANE, 1,1,2- TRICHLORO	10
000111-44-4	ETHANE, 1,1'- OXYBIS 2- CHLORO	10
000106-93-4	ETHANE, 1,2- DIBROMO	10
000075-00-3	ETHANE, CHLORO	10
000110-80-5	ETHANOL, 2- ETHOXY-	10
000122-99-6	ETHANOL, 2- PHENOXY	10
000540-59-0	ETHENE, 1,2- DICHLORO	2.5
000075-35-4	ETHENE,1,1- DICHLORO	10
000141-78-6	ETHYL ACETATE	75000
000064-17-5	ETHYL ALCOHOL (ETHANOL)	250
000541-41-3	ETHYL CHLOROFORMAT E	2.5
000100-41-4	ETHYLBENZENE	10
000079-06-1	ETHYLENE CARBOXAMIDE	10
000206-44-0	FLUORANTHENE	10
000086-73-7	FLUORENE	10
016984-48-8	FLUORIDE	2.5
000050-00-0	FORMALDEHYDE	10
000064-18-6	FORMIC ACID	2.5
068606-21-3	GLYCOLS, C10-16	10
000110-54-3	HEXANE	10
000302-01-2	HYDRAZINE	10
007647-01-0	HYDROGEN CHLORIDE	10
007664-39-3	HYDROGEN FLUORIDE	10
007783-06-4	HYDROGEN SULFIDE	250
007790-92-3	HYPOCHLOROUS ACID CLHO	100
000193-39-5	INDENO[1,2,3- CD]PYRENE	10
000078-83-1	ISOBUTYL ALCOHOL	75000
000067-63-0	ISOPROPYL ALCOHOL	75000
000108-20-3	ISOPROPYL ETHER	2.5
007439-92-1	LEAD	10
007439-95-4	MAGNESIUM	75000



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007439-96-5	MANGANESE	10
000149-30-4	MERCAPTOBENZ OTHIAZOLE, 2-	2.5
007439-97-6	MERCURY	10
000074-82-8	METHANE	75000
000067-56-1	METHYL ALCOHOL	10
000074-83-9	METHYL BROMIDE	10
000074-87-3	METHYL CHLORIDE	10
000078-93-3	METHYL ETHYL KETONE	75000
000060-34-4	METHYL HYDRAZINE	10
001634-04-4	METHYL TERTBUTYL ETHER	10
000057-55-6	METHYLETHYL GLYCOL	2.5
007439-98-7	MOLYBDENUM	2.5
000121-44-8	N,N-DIETHYL ETHANAMINE	10
000091-20-3	NAPHTHALENE	10
000142-82-5	N-HEPTANE	75000
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	10
010024-97-2	NITROUS OXIDE	75000
0NY210-00-0	OXIDES OF NITROGEN	75000
000106-89-8	OXIRANE, (CHLOROMETHY L)	10
0NY075-00-0	PARTICULATES	75000
000109-66-0	PENTANE	2.5
000127-18-4	PERCHLOROETH YLENE	10
000085-01-8	PHENANTHRENE	10
000108-95-2	PHENOL	10
000080-46-6	PHENOL, 4-(1,1- DIMETHYLPROP YL)-	2.5
000115-86-6	PHOSPHORIC ACID TRIPHENYL ESTER C18H15O4P	2.5
007723-14-0	PHOSPHORUS (YELLOW)	10
0NY075-02-5	PM 2.5	250
0NY075-00-5	PM-10	75000
000074-98-6	PROPANE	2.5
000078-87-5	PROPANE, 1,2- DICHLORO	10
000107-13-1	PROPENETRILE	10
000123-38-6	PROPIONALDEH YDE	10
000129-00-0	PYRENE	10
000110-86-1	PYRIDINE	25
007782-49-2	SELENIUM	10
007440-22-4	SILVER	40
000100-42-5	STYRENE	10
007446-09-5	SULFUR DIOXIDE	75000
007664-93-9	SULFURIC ACID	250
000077-78-1	SULFURIC ACID,	10



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	DIMETHYL ESTER	
000109-99-9	TETRAHYDROFU RAN	75000
007440-28-0	THALLIUM	2.5
000108-88-3	TOLUENE	10
0NY100-00-0	TOTAL HAP	250
000079-01-6	TRICHLOROETH YLENE	10
007440-62-2	VANADIUM	2.5
000075-01-4	VINYL CHLORIDE	10
0NY998-00-0	VOC	75000
001330-20-7	XYLENE, M, O & P MIXT.	10
007440-66-6	ZINC	2.5

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



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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



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are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a 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.



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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, 1 -52, 1 -53	Prevention of Significant Deterioration
U-00015/-/K14	40CFR 52-A.21	212, 1 -72	Prevention of Significant



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U-00015/-/K15	40CFR 52-A.21	1	-75	Deterioration Prevention of Significant Deterioration Prevention of Significant Deterioration
U-00051/32102/K18/32111	40CFR 52-A.21	269		General provisions
U-00015	40CFR 60-A	149		February 28, 2005
U-00015	40CFR 60-Db.42b(k)(2)	1	-54	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, 1	-77	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)	1	-55	Reporting and Recordkeeping Requirements.
U-00015	40CFR 60-Db.49b(h)	1	-56	Reporting and Recordkeeping Requirements.
U-00015/-/K21	40CFR 60-GG.332(a)	1	-76	Standard for oxides of nitrogen
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 operations - reporting reqts
FACILITY	40CFR 61-M	27		Asbestos standards for: asbestos mills, manufacturing operations using asbestos, and other sources
FACILITY	40CFR 63-	1	-9	



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U-00008	A.6(i)(4)(i)(' 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
FACILITY	40CFR 63-DDDDD	1 -10	Boilers and Process Heaters Major Source NESHAP rule
FACILITY	40CFR 63-DDDDD.7495(b)	1 -11	ICI Boiler Major Source NESHAP - Compliance Date for Existing Sources
U-00015	40CFR 63-DDDDD.7495(b)	157, 1 -57	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, 1 -73	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, 1 -79	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
FACILITY	40CFR 63-DDDDD.7500(a)(1 -12	ICI Boiler Major Source NESHAP - Good Air Pollution Control Practices
U-00015/-/K13/321AH	40CFR 63-DDDDD.7500(a)(1 -68	ICI Boiler Major Source NESHAP - Good Air Pollution Control Practices
U-00015/-/K13/321AI	40CFR 63-DDDDD.7500(a)(1 -71	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
U-00015/-/K07	40CFR 63-DDDDD.7500(c)	1 -65	ICI Boiler Major Source NESHAP -



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U-00015	40CFR 63- DDDDD.7501(a)	166	Limited-Use Boilers and Process Heaters 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
FACILITY	40CFR 63- DDDDD.7505(c)	1 -13	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
U-00015/-/K23	40CFR 63-DDDDD.7520	241	ICI Boiler Major Source NESHAP - Stack



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U-00015	40CFR 63- DDDDD.7521(a)	174		Test Requirements 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
FACILITY	40CFR 63- DDDDD.7530(a)	1	-14	ICI Boiler Major Source NESHAP - Initial Compliance Demonstration
U-00015	40CFR 63- DDDDD.7530(a)	178, 1	-58	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
FACILITY	40CFR 63- DDDDD.7530(b)	1	-15	ICI Boiler Major Source NESHAP - Initial Compliance Demonstration Through Performance Testing
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
FACILITY	40CFR 63- DDDDD.7530(c)	1	-16	ICI Boiler Major Source NESHAP - Initial Compliance Demonstration Through Fuel Analysis
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
FACILITY	40CFR 63-	1	-17	Boiler MACT - Tune up



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	DDDDD.7530(d)			certification, small units and gas 1 units
U-00015/-/K24	40CFR 63- DDDDD.7530(d)	265		Boiler MACT - Tune up certification, small units and gas 1 units
FACILITY	40CFR 63- DDDDD.7530(e)	1	-18	ICI Boiler Major Source NESHAP - Certification of Energy Assessment
U-00015	40CFR 63- DDDDD.7530(e)	181		ICI Boiler Major Source NESHAP - Certification of Energy Assessment
FACILITY	40CFR 63- DDDDD.7530(h)	1	-19	ICI Boiler Major Source NESHAP - Work Practice Standards
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
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
FACILITY	40CFR 63- DDDDD.7545(e)	1	-20	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



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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 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-	261	ICI Boiler Major



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	DDDDD.7555(i)		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
FACILITY	40CFR 63-DDDDD.7565	1 -21	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/Malf unction 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
U-00008/09503	40CFR 63- EEE.1206(c)(4)	63, 64, 65, 66	Hazardous Waste Combustor NESHAP - Emergency Safety Vent Openings
U-00008/09503	40CFR 63- EEE.1206(c)(5)	67	Hazardous Waste Combustor NESHAP - Combustion system leaks
U-00008/09503	40CFR 63- EEE.1206(c)(6)	68, 69, 70, 71	Hazardous Waste Combustor NESHAP - Operator training and certification
U-00008/09503	40CFR 63- EEE.1206(c)(7)	72	Hazardous Waste Combustor NESHAP - Operation and maintenance plan
U-00008/09503	40CFR 63-EEE.1207	73, 74	Performance Test Requirements
U-00008/09503	40CFR 63- EEE.1207(j)(1)	75	Hazardous Waste Combustor NESHAP - Notification of Compliance for comprehensive performance testing
U-00008/09503	40CFR 63- EEE.1207(j)(2)	76	Hazardous Waste Combustor NESHAP -



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U-00008/09503	40CFR 63-EEE.1207(1)	77, 78	Notification of compliance for confirmatory performance testing Hazardous Waste Combustor NESHAP - failure of performance test
U-00008/-/K02	40CFR 63-EEE.1209(a)(6)	50	Hazardous Waste Combustor NESHAP - Calculation of rolling averages
U-00008/09503	40CFR 63-EEE.1209(b)	79	CMS monitoring requirements
U-00008/-/K02	40CFR 63-EEE.1209(b)(5)	51	Hazardous Waste Combustor NESHAP - Calculation of rolling averages for continuous monitoring systems
U-00008/09503	40CFR 63-EEE.1209(c)(2)	80	Hazardous Waste Combustor NESHAP - Feedstream analysis plan
U-00008/09503	40CFR 63-EEE.1209(g)(2)	81, 82, 83, 84, 85, 86	Hazardous Waste Combustor NESHAP - Alternative Monitoring Requirements
U-00008/09503	40CFR 63-EEE.1209(k)(2)	87, 88	Hazardous Waste Combustor NESHAP - D/F monitoring parameters - Min. combustion chamber temperature
U-00008/09503	40CFR 63-EEE.1209(k)(4)	89	Hazardous Waste Combustor NESHAP - Dioxin/Furan monitoring - max. hazardous waste feedrate
U-00008/09503	40CFR 63-EEE.1209(l)(1)	90	Hazardous Waste Combustor NESHAP - Mercury monitoring - feedrate of total mercury limit
U-00008/09503	40CFR 63-EEE.1209(l)(2)	91	Hazardous Waste Combustor NESHAP - Mercury monitoring - wet scrubber limit
U-00008/09503	40CFR 63-EEE.1209(m)(1)	92	Hazardous Waste Combustor NESHAP - PM monitoring - high energy wet scrubber monitoring
U-00008/09503	40CFR 63-EEE.1209(m)(1)	93, 94	Hazardous Waste Combustion NESHAP - Monitoring Standards - PM operating parameter limits for wet scrubbers
U-00008/09503	40CFR 63-EEE.1209(m)(1)	95, 96	Hazardous Waste Combustor NESHAP - PM monitoring - high energy wet scrubbers



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U-00008/09503	40CFR 63- EEE.1209(m)(3)	97	Hazardous Waste Combustion NESHAP - Monitoring Standards - PM maximum ash feedrate
U-00008/09503	40CFR 63- EEE.1209(n)(2)	98, 99	Hazardous Waste Combustion NESHAP - Monitoring Standards - semivolatile and low volatility metals - maximum feedrate of metal
U-00008/09503	40CFR 63- EEE.1209(o)(1)	100	Hazardous Waste Combustor NESHAP - Hydrochloric acid and chlorine gas monitoring provisions
U-00008/09503	40CFR 63- EEE.1209(o)(3)	101	Hazardous Waste Combustor NESHAP - Hydrochloric acid and chlorine gas monitoring provisions
U-00008/09503	40CFR 63- EEE.1209(o)(3)	102	Hazardous Waste Combustor NESHAP - Hydrochloric acid and chlorine gas monitoring provisions
U-00008/09503	40CFR 63- EEE.1209(o)(3)	103	Hazardous Waste Combustor NESHAP - Hydrochloric acid and chlorine gas monitoring provisions
U-00008/-/K02	40CFR 63-EEE.1211(a)	52, 53	Hazardous Waste Combustion NESHAP - Recordkeeping and Reporting Requirements
U-00008/09503	40CFR 63-EEE.1211(b)	104	Hazardous Waste Combustor NESHAP - Recordkeeping requirements
U-00008/09503	40CFR 63-EEE.1219(a)	105, 106	Hazardous Waste Combustion NESHAP - Replacement Standards - Emission limits for existing sources
FACILITY	40CFR 63-ZZZZ	34	Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 63-ZZZZ.6665	35	Reciprocating Internal Combustion Engine (RICE) NESHAP - General provisions
U-00015	40CFR 64	203, 1 -59, 1 -60, 1 -61	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 64.7	36, 1 -22	CAM - Operation of approved monitoring
FACILITY	40CFR 64.8	37, 1 -23	CAM - Quality improvement plan (QIP) requirements
FACILITY	40CFR 64.9	38, 1 -24	CAM - Reporting and recordkeeping requirements
FACILITY	40CFR 68	19	Chemical accident prevention provisions



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FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	275	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 39, 40, 1 -2	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	1 -1	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)	23	Operational Flexibility
U-00015	6NYCRR 201-6.4(f)	113, 1 -25	Operational Flexibility
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	24	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	276	General Prohibitions - visible emissions limited.
U-00008	6NYCRR 211.2	278	General Prohibitions - visible emissions



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U-00008/09503	6NYCRR 212.10(c)(3)	57	limited. NOx and VOC RACT required at major facilities
U-00008/R1601/K06	6NYCRR 212.10(c)(4)(iii)	111, 112	General Process Emission Sources - NOx and VOC RACT required at major facilities
U- 00008/09601/K06/096AA FACILITY	6NYCRR 212.10(f) 6NYCRR 212.4(a)	109, 110 277	NOx and VOC RACT required at major facilities General Process Emission Sources - emissions from new sources and/or modifications
U-00008/-/K06/096AA	6NYCRR 212.4(a)	279, 280	General Process Emission Sources - emissions from new sources and/or modifications
U-00008/09503/K02	6NYCRR 212.4(a)	282	General Process Emission Sources - emissions from new sources and/or modifications
U-00008/R1601/K06	6NYCRR 212.4(a)	283	General Process Emission Sources - emissions from new sources and/or modifications
U-00008/09503 U- 00008/09504/K06/095AG	6NYCRR 212.4(b) 6NYCRR 212.4(c)	281 107	New processes General Process Emission Sources - emissions from new processes and/or modifications
U- 00008/09508/K06/095AJ	6NYCRR 212.4(c)	108	General Process Emission Sources - emissions from new processes and/or modifications
U- 00051/32106/K18/321AD	6NYCRR 212.4(c)	270	General Process Emission Sources - emissions from new processes and/or modifications
U- 00051/32107/K18/321AE	6NYCRR 212.4(c)	271	General Process Emission Sources - emissions from new processes and/or modifications
U- 00051/M9001/K18/M90AA	6NYCRR 212.4(c)	272	General Process Emission Sources - emissions from new processes and/or modifications
U-00008	6NYCRR 212.6(a)	43	General Process Emission Sources - opacity of emissions limited
U-00051	6NYCRR 212.6(a)	268	General Process Emission Sources - opacity of emissions



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FACILITY	6NYCRR 212-1.1(a)(1)	1	-3	limited
FACILITY	6NYCRR 215.2	9		General Provisions - Applicability
U-00015	6NYCRR 225-1.2(a)	1	-26	Open Fires - Prohibitions
U-00015	6NYCRR 225-1.2(c)	1	-27	Sulfur-in-Fuel Limitations
U-00015	6NYCRR 225-1.2(e)	1	-28	Sulfur-in-Fuel Limitations
U-00015	6NYCRR 225-1.2(f)	1	-29	Sulfur-in-Fuel Limitations
U-00015	6NYCRR 225-1.2(h)	1	-30	Sulfur-in-Fuel Limitations
U-00015/-/K15	6NYCRR 225-1.2(h)	1	-74	Sulfur-in-Fuel Limitations
U-00015	6NYCRR 225-1.4	1	-31, 1	Variances
U-00015	6NYCRR 225-1.5	1	-33	Emissions and Fuel Monitoring
U-00015	6NYCRR 225-1.6(f)	1	-34	Excess Emission Reports
U-CLEAN	6NYCRR 226	273		SOLVENT METAL CLEANING PROCESSES
FACILITY	6NYCRR 227-1.2(a)(1)	1	-4	Particulate Emissions from Liquid Fuels.
U-00015/-/K07	6NYCRR 227-1.2(a)(1)	204, 1	-62	Particulate Emissions from Liquid Fuels.
U-00015/-/K12	6NYCRR 227-1.2(a)(1)	207		Particulate Emissions from Liquid Fuels.
U-00015/-/K23	6NYCRR 227-1.2(a)(1)	225		Particulate Emissions from Liquid Fuels.
U-00015/-/K13/321AH	6NYCRR 227-1.2(a)(4)	209, 1	-67	Particulate Emissions Firing Solid Fuels.
U-00015/-/K13/321AI	6NYCRR 227-1.2(a)(4)	210, 1	-69	Particulate Emissions Firing Solid Fuels.
E-ENGINE	6NYCRR 227-1.3(a)	41		Smoke Emission Limitations.
U-00015	6NYCRR 227-1.3(a)	1	-35, 1	Smoke Emission Limitations.
U-00015/-/K23	6NYCRR 227-1.3(a)	1	-78	Smoke Emission Limitations.
U-00015	6NYCRR 227-1.4(b)	1	-37	Stack Monitoring
U-00015	6NYCRR 227-1.4(c)	127		Stack Monitoring
U-00015	6NYCRR 227-2	1	-38, 1	Reasonably available control technology for NOx
FACILITY	6NYCRR 227-2.4(a)(1)(i)	1	-5	2010 NOx RACT presumptive limits.
U-00015	6NYCRR 227-2.4(a)(1)(i)	131		2010 NOx RACT presumptive limits.
U-00015	6NYCRR 227-2.4(a)(2)	1	-40	NOx requirements.
U-00015/-/K13	6NYCRR 227-2.4(a)(2)	208, 1	-66	NOx requirements.
E-ENGINE	6NYCRR 227-2.4(d)	42		Small boilers, small combustion turbines, and small stationary internal combustion engines.
U-00015	6NYCRR 227-2.4(e)(3)	1	-41	NOx requirements for other combustion turbines.
U-00015/-/K07	6NYCRR 227-2.5(c)	205, 1	-63, 1	Alternative RACT option.
U-00015	6NYCRR 227-2.6	1	-42, 1	Testing, monitoring, and reporting
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U-00015	6NYCRR 227-2.6(b)	135, 1	-45	requirements
U-00008/-/K04/095AK	6NYCRR	56		CEMS requirements
	229.3(e)(2)(iv)			Volatile organic
U-00008/-/K04/091AE	6NYCRR 229.3(e)(2)(v)	55		liquid storage tanks
				Volatile organic
U-00015/-/K25/321AK	6NYCRR 229.3(e)(2)(v)	267		liquid storage tanks
				Volatile organic
U-00008/-/K04	6NYCRR 229.5(d)	54		liquid storage tanks
				Recordkeeping - VOL
U-00015/-/K25	6NYCRR 229.5(d)	266		storage tanks
				Recordkeeping - VOL
U-00015/-/K13/321AI	6NYCRR 231-10	1	-70	storage tanks
				Emission Reduction
FACILITY	6NYCRR 231-10.1	1	-6	Credits (ERCs)
FACILITY	6NYCRR 231-11.2(b)	1	-7	General provisions
				Reasonable
				Possibility
				requirements for
				insignificant mods -
				less than 50% with
				excluded emissions
FACILITY	6NYCRR 231-11.2(c)	1	-8	Reasonable
				Possibility
				requirements for
				insignificant mods -
				greater than 50% with
				excluded emissions
U-00015	6NYCRR 231-6.2	1	-46, 1 -47	Netting
U-00015	6NYCRR 231-8.2	1	-48, 1 -49, 1 -	Netting
		50, 1	-51	
U-00015	6NYCRR 242-1.4(b)	284, 1	-80	CO2 Budget Trading
				Program - Limited
				exemption - units w/
				electrical output to
				the grid restricted
				by permit conditions
U-00015	6NYCRR 249	285, 1	-81	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



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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



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

6 NYCRR 201-6.4 (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.



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6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, 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 60.332 (a)

This regulation sets forth the equation to be used to determine the allowable emissions of oxides of nitrogen (NO_x).

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)

40 CFR 60.48b (j)

This citation allows the use of vendor fuel certifications instead of emissions monitoring for PM.



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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.



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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.



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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).



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- (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.



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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



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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



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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')

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 (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



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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)



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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)

40 CFR 63.7530 (b)



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40 CFR 63.7530 (c)

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)

40 CFR 63.7530 (h)

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



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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.



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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 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



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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 DDDDD

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

40 CFR Part 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 less stringent 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 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.



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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.



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6 NYCRR 212-1.1 (a) (1)

The provisions of the revised Part 212, effective June 14, 2015, applies to process equipment for a new or modified permit or registration or upon issuance of a renewal for an existing permit or registration.

6 NYCRR 225-1.2 (a)

Sulfur-in-fuel limitation for new coal fired facilities.

6 NYCRR 225-1.2 (c)

Sulfur-in-fuel limitations for solid fuel fired facilities on or after July 1, 2014.

6 NYCRR 225-1.2 (e)

Sulfur-in-fuel limitations for residual oil in the remainder of the State on or after July 1, 2014.

6 NYCRR 225-1.2 (f)

Sulfur-in-fuel limitations for the purchase of #2 heating oil on or after July 1, 2012.

6 NYCRR 225-1.2 (h)

Sulfur-in-fuel limitation for the firing of distillate oil on or after July 1, 2016.

6 NYCRR 225-1.4

This sections allows variances from the sulfur-in-fuel limits in section 2 of this Subpart.

6 NYCRR 225-1.5

This section establishes the emission and fuel monitoring required by this regulation.

6 NYCRR 225-1.6 (f)

This citation requires subject facilities to submit excess emissions reports to the Department.



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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)

Future 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.



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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 231-10.1

This section contains the general provisions of this Subpart.

6 NYCRR 231-11.2 (b)

This subdivision is referred to as the "Reasonable Possibility" provisions. This citation lists the record keeping requirements for insignificant modifications that are less than 50% of the applicable significant



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project threshold including excluded emissions as defined in Part 231-4.1(b)(40)(i)(c).

6 NYCRR 231-11.2 (c)

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

6 NYCRR 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).



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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	1-52	record keeping/maintenance procedures
U-00015	1-53	intermittent emission testing
U-00015	147	record keeping/maintenance procedures
U-00015	148	intermittent emission testing
U-00015/-/K14	1-72	record keeping/maintenance procedures
U-00015/-/K14	212	record keeping/maintenance procedures
U-00015/-/K15	1-75	intermittent emission testing
U-00051/32102/K18/32111	269	monitoring of process or control device parameters as surrogate
U-00015	1-54	monitoring of process or control device parameters as surrogate
U-00015/-/K22	1-77	record keeping/maintenance procedures
U-00015/-/K22	224	record keeping/maintenance procedures
U-00015	153	record keeping/maintenance procedures
U-00015	1-55	record keeping/maintenance procedures
U-00015	1-56	record keeping/maintenance procedures
U-00015/-/K21	1-76	intermittent emission testing
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	1-9	record keeping/maintenance procedures
U-00008	45	record keeping/maintenance procedures
U-00008	46	work practice involving specific operations
FACILITY	1-10	record keeping/maintenance procedures
FACILITY	1-11	record keeping/maintenance procedures
U-00015	1-57	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	1-73	intermittent emission testing
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	1-79	intermittent emission testing
U-00015/-/K23	226	record keeping/maintenance procedures
U-00015/-/K23	227	record keeping/maintenance procedures



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U-00015/-/K23	228	record keeping/maintenance procedures
U-00015/-/K23	229	intermittent emission testing
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/-/K13/321AH	1-68	monitoring of process or control device parameters as surrogate
U-00015/-/K13/321AI	1-71	monitoring of process or control device parameters as surrogate
U-00015	165	record keeping/maintenance procedures
U-00015/-/K07	1-65	record keeping/maintenance procedures
U-00015	167	record keeping/maintenance procedures
U-00015/-/K23	236	record keeping/maintenance procedures
FACILITY	1-13	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
FACILITY	1-14	record keeping/maintenance procedures
U-00015	1-58	record keeping/maintenance procedures
U-00015	178	record keeping/maintenance procedures
U-00015/-/K23	244	record keeping/maintenance procedures
FACILITY	1-15	record keeping/maintenance procedures
U-00015	179	record keeping/maintenance procedures
U-00015/-/K23	245	record keeping/maintenance procedures
FACILITY	1-16	record keeping/maintenance procedures
U-00015	180	record keeping/maintenance procedures
U-00015/-/K23	246	record keeping/maintenance procedures
FACILITY	1-17	record keeping/maintenance procedures
U-00015/-/K24	265	record keeping/maintenance procedures
FACILITY	1-18	record keeping/maintenance procedures
U-00015	181	record keeping/maintenance procedures
FACILITY	1-19	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
FACILITY	1-20	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



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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



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U-00008/09503	97	as surrogate 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
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	1-59	continuous emission monitoring (cem)
U-00015	1-60	continuous emission monitoring (cem)
U-00015	1-61	continuous emission monitoring (cem)
U-00015	203	continuous emission monitoring (cem)
FACILITY	1-22	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	1-23	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
FACILITY	1-24	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
FACILITY	1-2	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
U-00015	1-25	record keeping/maintenance procedures
U-00015	113	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
FACILITY	1-3	record keeping/maintenance procedures



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U-00015	1-26	work practice involving specific operations
U-00015	1-27	work practice involving specific operations
U-00015	1-28	work practice involving specific operations
U-00015	1-29	work practice involving specific operations
U-00015	1-30	work practice involving specific operations
U-00015/-/K15	1-74	work practice involving specific operations
U-00015	1-31	record keeping/maintenance procedures
U-00015	1-32	record keeping/maintenance procedures
U-00015	1-33	record keeping/maintenance procedures
U-00015	1-34	record keeping/maintenance procedures
U-CLEAN FACILITY	273	record keeping/maintenance procedures
U-00015/-/K07	1-4	intermittent emission testing
U-00015/-/K07	1-62	record keeping/maintenance procedures
U-00015/-/K12	204	record keeping/maintenance procedures
U-00015/-/K23	207	intermittent emission testing
U-00015/-/K13/321AH	225	intermittent emission testing
U-00015/-/K13/321AH	1-67	intermittent emission testing
U-00015/-/K13/321AI	209	intermittent emission testing
U-00015/-/K13/321AI	1-69	intermittent emission testing
E-ENGINE	210	intermittent emission testing
U-00015	41	monitoring of process or control device parameters as surrogate
U-00015	1-35	intermittent emission testing
U-00015	1-36	continuous emission monitoring (cem)
U-00015/-/K23	1-78	monitoring of process or control device parameters as surrogate
U-00015	1-37	record keeping/maintenance procedures
U-00015	1-38	record keeping/maintenance procedures
U-00015	1-39	record keeping/maintenance procedures
FACILITY	1-5	continuous emission monitoring (cem)
U-00015	131	continuous emission monitoring (cem)
U-00015	1-40	continuous emission monitoring (cem)
U-00015/-/K13	1-66	continuous emission monitoring (cem)
U-00015/-/K13	208	continuous emission monitoring (cem)
E-ENGINE	42	record keeping/maintenance procedures
U-00015	1-41	continuous emission monitoring (cem)
U-00015/-/K07	1-63	work practice involving specific operations
U-00015/-/K07	1-64	intermittent emission testing
U-00015/-/K07	205	work practice involving specific operations
U-00015	1-42	record keeping/maintenance procedures
U-00015	1-43	record keeping/maintenance procedures
U-00015	1-44	record keeping/maintenance procedures
U-00015	1-45	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	1-70	monitoring of process or control device parameters as surrogate
FACILITY	1-6	monitoring of process or control device parameters as surrogate
FACILITY	1-7	record keeping/maintenance procedures
FACILITY	1-8	record keeping/maintenance procedures
U-00015	1-46	monitoring of process or control device parameters as surrogate
U-00015	1-47	monitoring of process or control device parameters as surrogate
U-00015	1-48	monitoring of process or control device parameters as surrogate
U-00015	1-49	monitoring of process or control device parameters as surrogate
U-00015	1-50	monitoring of process or control device parameters as surrogate
U-00015	1-51	monitoring of process or control device parameters as surrogate
U-00015	1-80	record keeping/maintenance procedures



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U-00015	284	record keeping/maintenance procedures
U-00015	1-81	record keeping/maintenance procedures
U-00015	285	record keeping/maintenance procedures

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 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.



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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 to 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



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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 citations 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 from 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 technological 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



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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 to burn 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 to 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 described 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)



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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, 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,



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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. No visible emissions are expected from natural gas fired sources. Boilers combusting fuels other than natural gas only will be required to make daily stack observations when not burning gas.

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 boiler. The conditions state the NOx limits and specify Continuous Emission Monitoring (CEM) requirements to be followed for demonstrating compliance with 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.

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)



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A condition under this citation establishes the NO_x emission limit for RED's new turbine and Heat Recovery Steam Generating (HRSG) equipment. Each turbine/HRSG combination will be equipped with SCR and exhausted together through a stack (PGT01). The HRSG duct burner cannot be operated separately from the turbine. The permit requires that compliance with the stack limit will be monitored via certified CEMs. The 0.02 lb/mmbtu NO_x 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 burner alone, or the 40 CFR Subpart GG limit for the turbine.

6NYCRR Part 227-2.5(c)

Package Boilers 1, 2, 3 and 4 (ES 031AC, 031AD, 031AE, 031AF) are each limited to 200,000 gallons of residual #6 oil per year calculated on a 12 month rolling average. By complying with the Part 227-2.5(c) fuel use record keeping requirements of this condition, RED is also satisfying the Boiler MACT Limited Use 10% annual capacity record keeping requirements.

6NYCRR Part 227-2.6

A condition under this citations specifies which boilers are required to use continuous emission monitors (CEMS) for NO_x and the associated quarterly reporting requirements, including the CEMs performance audits, downtime, and excess emissions reporting.

6NYCRR Part 227-2.6(b)

A condition under this citation specifies the requirements for certifying the required NO_x 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, NO_x, VOC, Particulate, PM-10, PM2.5 and greenhouse gases (GHGs) but does not result in a significant 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.



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6 NYCRR Part 231-6.2

Conditions have been included to document the limits for NO_x 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.

Final Scenario ERC's used:

NO_x 559.6
VOC 3.5

6 NYCRR Part 231-8.2

Conditions have been included to limit emissions of Particulate, PM-10 and PM_{2.5} 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; PM_{2.5} = 10 tpy)

Final Scenario ERC's used:

PM: 384.0
PM10: 399.6
PM2.5: 412.3

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:

Final Scenario:

CO cap: 108.6 tons Project ERCs + 42.3 tpy Potential Actual Emissions of modified Boiler 44 + 99 tpy allowable increase = 250.0 tpy

6 NYCRR Part 231-10

Operation of Boiler #43 will be 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.

Emission Reduction Credits (ERCs) have been established and used as part of the powerhouse conversion project. These ERC quantities are documented on the ERC Quantification Forms in Attachment A of RED's permit application (Revised September 20, 2016) and the Use of ERC Forms in Attachment A of RED's application (Revised September 20, 2016). The quantities of ERCs used for the netting project are 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.

Final Scenario - ERCs resulting from shut downs into March 2018:

NO_x: = 567.6 tpy
PM: = 870.6 tpy



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PM10: = 719.2 tpy
PM2.5: = 570.7 tpy
VOC: = 18.1 tpy
CO: = 108.6 tpy

Final Scenario - ERCs used to offset potential emission increases:

NOx: = 599.6 tpy
PM: = 384.0 tpy
PM10: = 399.6 tpy
PM2.5: = 412.3 tpy
VOC: = 3.5 tpy
CO: = 108.6 tpy

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.

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).



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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 initial 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 instantaneous 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.

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.



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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 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 (NO_x)

Boiler 44 would be subject to NO_x 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 NO_x. Boiler 44 is currently equipped with both COMs and NO_x 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 section 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 Generator (HRSG): 0.001 lb SO₂ /mmbtu

New HP & MP boilers burning Natural Gas: 0.001 lb SO₂/mmBtu

New 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 a MP dual-fueled boilers (321BK) which is subject to the 20% opacity limit when firing oil. Because this boiler is 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)



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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. Compliance with 225-1.2(h), effective July 1, 2016, satisfies the requirements of this citation

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 (321BL, 321BM and 321BN) 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 generator (HRSG) (321BE) 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/turbine are subject to a more stringent 0.02 lb/mmbtu limit which will be monitored via CEMS at the stack. The duct burner is vented along with the turbine to a stack and will not operate separately. Therefore, the less stringent Subpart Db limit for the duct burner 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 constructed after 1997, burning coal, oil, or gas or a combination of these fuels applies to RED's new dual-fuel MP Boiler (321BK) and three natural gas only HP boilers (321BL, 321BM and 321BN).

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 Subpart 227-2, this Subpart Db limit has not been included in the permit.

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 burner of this combined cycle system. It is impossible to monitor emissions from the duct burner exclusively as the operation is in conjunction with the turbine 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 the turbine/HRSG (with associated duct burner) unit, RED will opt, as allowed under paragraph (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 installing a Continuous Opacity Monitor



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(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 NO_x CEMs to demonstrate compliance with Subpart Db NO_x standards under section 60.44b. However, these boilers are subject to more stringent NO_x limits according to Subpart 227-2 requirements in this permit and corresponding 227-2 NO_x CEMs requirements. Therefore, Subpart Db requirements for NO_x 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 burner on their heat recovery steam generators (HRSG) is exempt from NO_x CEMs requirements. However, based on these units size, it is required to be equipped with NO_x 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 NO_x limits and NO_x CEMs certification and monitoring requirements under Subpart 227-2 NO_x RACT which are equivalent or more stringent to the Subpart Db requirements. Therefore, the NO_x CEMs certifications for the new turbine/HRSG 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 NO_x 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 NO_x, RED may opt to submit a single quarterly NO_x report addressing the requirements of both rules.



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60.49b(h)

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

40 CFR 60 Subpart GG

Although RED's proposed gas-fired turbine (ES 321BA) is 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 turbine is more stringently regulated under Part 225 and Part 227 requirements. RED will burn natural gas only with minimal sulfur content.

The turbines is subject to a calculated NO_x 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 turbine is subject to a case-by-case RACT determination under Subpart 227-2 which has resulted in a more stringent NO_x limit of 0.02 lb/mmbtu and must install a CEMs to demonstrate compliance with this NO_x RACT limit at the stack. It is impossible to monitor emissions from the turbines exclusively because they must be operated in conjunction with the duct burners with combined emissions to a common stack. Therefore, RED will opt to use NO_x 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.



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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 citation 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. RED has initiated discussion with EPA to extend MACT compliance until March of 2018. Outcome is pending.

40 CFR 63-DD Offsite Waste NESHAP

40 CFR 63-DD.680(f)



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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 automatically 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)



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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 minburn 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 paragraph 1209(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 minimum 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



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(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



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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

Conditions 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 to 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- 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 generators: Bldg 311 669 BHP diesel fueled fire pump and Bldg 602 227 BHP diesel fueled fire pump. New York State has not accepted 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 new boilers.

40 CFR 63.7495(a)



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The MACT rule will apply to RED's 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, combusting No. 2 Fuel Oil and Natural Gas in 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: 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,
HP NG-only Boiler #2 (emission source 321BM >250 mmbtu/hr) combusting natural gas only and
HP NG-only Boiler #3 (emission source 321BN >250 mmbtu/hr) combusting 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). 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 tests 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.



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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)

Use of 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) and Package Boilers (031AC, 031AD, 031AE and 031AF), RED must keep records of the days of operation until such time as Boiler #43 is decommissioned.

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 initial compliance demonstration through a performance test and fuel analysis to establish operating limits.

40 CFR 63.7530(b)



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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 for the 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 assessability 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.



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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 #42, #43 and #44. Testing for Boiler #42 as conducted in August 2015. Testing for Boiler #44 was conducted in June 2016. Testing for Boiler #43 has not been conducted due to the infrequent operation of this boiler.

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.



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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.