

Facility DEC ID: 8261400823

**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 8-2614-00823/00001  
Mod 0 Effective Date: 02/09/2018 Expiration Date: 02/08/2023  
Mod 1 Effective Date: 07/13/2022 Expiration Date: 02/08/2023

Permit Issued To: CARESTREAM HEALTH INC  
150 VERONA ST  
ROCHESTER, NY 14608

Contact: LESLIE NICHOLAS  
1049 W RIDGE RD  
ROCHESTER, NY 14615  
(585) 627-6498

Facility: CARESTREAM HEALTH AT EASTMAN BUSINESS PARK  
1049 W RIDGE RD  
ROCHESTER, NY 14615

Description:  
Title V Facility Permit for the Carestream Health Inc - Health Imaging Facility, former Eastman Kodak health imaging operations in Eastman Business Park.

The Carestream Health Imaging Facility continues to be subject to 6 NYCRR Part 201-6 (Title V) regulations Part 212-3 VOC Reasonably Available Control Technology (RACT) limit for pressurized vessels, a scale, and solution delivery emissions vented through EP 01413, at 0.34 tons VOC per year, and revised Part 212 regulations reflecting changes in the Part 212 Best Available Control Technology (BACT) caps for Building 14 emission limits with respect to three emission points: Emission Point 01413, Emission Point 01425 and Emission Point 01427.

The permit retains emissions limits for acetone, methyl acetate, and dichloromethane, which are not applicable under the revised rule for these three emissions points, which were calculated to be below guideline concentrations and are thus protective of human health.

Research and Development (R&D) activities are being moved from Building 81 to Buildings 82 and 59.

For this modification (renewal #2/Mod #1) the dispensing tool, currently located at Carestream Health Care's STC facility in Canandaigua, will be moved to this Eastman Business Park location. New compounds in use due to this move are subject to requirements of 6 NYCRR Part 212. They include the use of PlioGrip and Loctite SI594 White Silicon RTV and would add emissions of volatile organic compounds (VOCs) and also 4,4'-Diphenylmethane diisocyanate (CAS Number 101-68-8), an A-rated volatile hazardous air pollutant (VHAP). Actual annual VOC emissions will increase by 6.8 pounds and potential VOC emissions by 231 pounds. Estimated annual emissions for each of the regulated air contaminants are less than 100 pounds per year so demonstrated compliance with Part 212 control requirements is not required.

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Compliance with 6 NYCRR 212 for 4,4'-Diphenylmethane diisocyanate will be demonstrated by maintaining actual emissions of this compound below the Mass Emission Limit. The relocated Dispense Tool will use PlioGrip Part A and B in 55 cc (1.69 oz) tubes, and Loctite SI549 in 300 mL (10.15 oz) tubes thereby qualifying for container size exemption under 6 NYCRR 228-2.2(a)(5). The net increase of VOC emissions from the new dispensing tool will not exceed NSR thresholds stipulated in 6 NYCRR Part 231-2 or 40 CFR 52.21. This change will not cause facility emissions to exceed any emission limitation or other condition in the existing Title V permit, will not cause the facility to become subject to any additional regulations or requirements, and does not seek to establish or modify a federally enforceable cap or limit.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator:           KIMBERLY A MERCHANT  
  6274 E AVON LIMA RD  
  AVON, NY 14414-9519

Authorized Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

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**Notification of Other State Permittee Obligations**

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

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- 5 3 Applications for permit renewals, modifications and transfers
- 6 4 Permit modifications, suspensions or revocations by the Department

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- 6 5 Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS

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**DEC GENERAL CONDITIONS**

**\*\*\*\* General Provisions \*\*\*\***

**For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.**

**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

**Item 1.2:**

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

**Item 1.3:**

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**

**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 2.1:**

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

**Condition 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

**Item 3.2:**

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

**Item 3.3**

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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**Condition 4: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator  
Region 8 Headquarters  
Division of Environmental Permits  
6274 Avon-Lima Road  
Avon, NY 14414-9519  
(585) 226-2466

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**Permit Under the Environmental Conservation Law (ECL)**

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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150 VERONA ST  
ROCHESTER, NY 14608

Facility: CARESTREAM HEALTH AT EASTMAN BUSINESS PARK  
1049 W RIDGE RD  
ROCHESTER, NY 14615

Authorized Activity By Standard Industrial Classification Code:  
3861 - PHOTOGRAPH EQUIPMENT & SUPPLIES

Mod 0 Permit Effective Date: 02/09/2018

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- 9 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 9 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 9 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 12 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 14 7 6 NYCRR 202-2.1: Compliance Certification
- 14 1-1 6 NYCRR 202-2.5: Recordkeeping requirements
- 14 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 16 1-2 6 NYCRR 200.7: Maintenance of Equipment
- 16 11 6 NYCRR 201-1.7: Recycling and Salvage
- 16 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 16 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 17 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 17 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 17 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 18 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 18 18 6 NYCRR 202-1.1: Required Emissions Tests
- 18 19 40 CFR Part 68: Accidental release provisions.
- 19 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 19 21 6 NYCRR 200.3: False statement
- 19 22 6 NYCRR Subpart 201-6: Compliance Schedule for Unpermitted Sources
- 20 23 6 NYCRR Subpart 201-6: Emission Unit Definition
- 20 24 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 20 1-3 6 NYCRR 201-6.4 (f): Operational Flexibility
- 21 25 6 NYCRR 201-6.4 (f): Compliance Certification
- 24 1-4 6 NYCRR 202-2.4 (a) (3): Statement dates for emissions statements.
- 24 26 6 NYCRR Part 207: Submittal of Episode Action Plans
- 24 81 6 NYCRR 211.2: Visible Emissions Limited
- 24 1-5 6 NYCRR 212-1.6 (a): Compliance Certification
- 26 1-6 6 NYCRR 212-2.1 (b): Compliance Certification
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- 27 1-9 6 NYCRR 212-2.4 (b): Compliance Certification
- 29 1-10 6 NYCRR 212-3.1 (c) (4) (iii): Compliance Certification
- 30 1-11 6 NYCRR 228-1.3 (a): Compliance Certification
- 31 1-12 6 NYCRR 228-1.6 (d): Compliance Certification
- 32 1-13 6 NYCRR 228-1.6 (f): Compliance Certification
- 33 29 40CFR 61, NESHAP Subpart M: National Emission Standard for Asbestos
- 33 30 40CFR 63.471(b)(2), Subpart T: Compliance Certification
- 34 31 40CFR 63.471(h), Subpart T: Compliance Certification
- 34 32 40CFR 63.Tbl 2, Subpart JJJJ: Subpart A Requirements for Subpart JJJJ
- 34 1-14 40CFR 63.3370(a)(5), Subpart JJJJ: Compliance Certification

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36 33 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit  
 37 34 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

**EU=U-00040**

41 35 6 NYCRR 201-6.4 (f) (1): Compliance Certification  
 42 36 6 NYCRR 212-1.5 (d): Compliance Certification

**EU=U-00040**

43 37 6 NYCRR 212-1.5 (e) (1): Demonstrating compliance  
 with Part 212 through the federal NSPS for the respective air  
 contaminant  
 43 38 6 NYCRR 212-1.5 (e) (2): Compliance Certification

**EU=U-00040**

43 1-15 40CFR 63.3400(c), Subpart JJJJ: Compliance Certification

**EU=U-00040,Proc=J02**

45 39 6 NYCRR 228-1.3 (b): Compliance Certification  
 46 40 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions  
 47 41 6 NYCRR 228-1.3 (d): Compliance Certification  
 48 42 6 NYCRR 228-1.5 (c): Overall removal efficiency calculation  
 51 44 6 NYCRR 228-1.6 (h): Compliance Certification

**EU=U-00040,Proc=J05**

51 46 40CFR 63.460(b), Subpart T: Applicability  
 51 47 40CFR 63.462(a)(2), Subpart T: Batch Cold Cleaning Machine Standards  
 52 48 40CFR 63.462(c), Subpart T: Compliance Certification  
 53 49 40CFR 63.471(c), Subpart T: Compliance Certification

**EU=U-00040,Proc=J09**

55 50 6 NYCRR Part 226: Compliance Certification

**EU=U-00040,EP=01413,Proc=J08**

56 52 6 NYCRR 212-2.1 (b): Compliance Certification

**EU=U-00040,EP=01425**

57 53 6 NYCRR 212-2.1 (b): Compliance Certification

**EU=U-00040,EP=01425,Proc=J05**

58 54 6 NYCRR 212-2.1 (b): Compliance Certification

**EU=U-00040,EP=01426,Proc=J02,ES=014AU**

59 55 6 NYCRR 212-2.1 (b): Compliance Certification

**EU=U-00040,EP=01427,Proc=J08**

59 56 6 NYCRR 212-2.1 (b): Compliance Certification

**EU=U-00040,EP=01428**

60 57 6 NYCRR 212-2.1 (b): Compliance Certification

**EU=U-00040,EP=03101**

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- 61 58 6 NYCRR 212-2.1 (b): Compliance Certification
- 62 59 6 NYCRR 212-2.1 (b): Compliance Certification
- 62 60 6 NYCRR 212-2.1 (b): Compliance Certification

**EU=U-00040,EP=03101,Proc=J02,ES=014AD**

- 64 62 40CFR 63.3350(e), Subpart JJJJ: Compliance Certification
- 65 63 40CFR 63.3350(e), Subpart JJJJ: Compliance Certification
- 66 64 40CFR 63.3350(f), Subpart JJJJ: Compliance Certification
- 67 68 40CFR 63.3400(c), Subpart JJJJ: Compliance Certification
- 69 70 40CFR 63.3410, Subpart JJJJ: Compliance Certification

**EU=U-00069,EP=10491**

- 70 73 6 NYCRR 212-2.1 (b): Compliance Certification

**EU=U-00069,EP=11706**

- 71 74 6 NYCRR 212-2.1 (b): Compliance Certification

**EU=U-00069,EP=117A0**

- 71 76 6 NYCRR 212-2.1 (b): Compliance Certification

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- 74 78 ECL 19-0301: Reporting Requirements for State-Only Enforceable Conditions
- 74 79 ECL 19-0301: Contaminant List
- 75 1-16 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 76 1-17 6 NYCRR 201-6.5 (a): CLCPA Applicability
- 76 27 6 NYCRR 211.1: Air pollution prohibited
- 77 1-18 6 NYCRR 212-2.1 (a): Compliance Demonstration

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**FEDERALLY ENFORCEABLE CONDITIONS**

Renewal 2/Mod 1/FINAL

\*\*\*\* Facility Level \*\*\*\*

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

- Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)**  
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.
- Item B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 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 C: Certification by a Responsible Official - 6 NYCRR 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 D: Requirement to Comply With All Conditions - 6 NYCRR 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 E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 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

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planned changes or anticipated noncompliance does not stay any permit condition.

**Item F: 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 G: 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 H: Severability - 6 NYCRR 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 I: Permit Shield - 6 NYCRR 201-6.4 (g)**

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

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

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- 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 J: Reopening for Cause - 6 NYCRR 201-6.4 (i)**

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

- i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of 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 the 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 section 201- 6.6 of this Subpart.
- 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 K: 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 L: 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.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.**

**Condition 1: Acceptable Ambient Air Quality**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement: 6 NYCRR 200.6**

**Item 1.1:**

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

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**Condition 2: Fees**

Effective between the dates of 02/09/2018 and 02/08/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)

**Item 2.1:**

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

**Condition 3: Recordkeeping and Reporting of Compliance Monitoring**

Effective between the dates of 02/09/2018 and 02/08/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (c)

**Item 3.1:**

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii)The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

**Condition 4: Records of Monitoring, Sampling, and Measurement**

Effective between the dates of 02/09/2018 and 02/08/2023

Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (2)

**Item 4.1:**

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

**Condition 5: Compliance Certification**

Effective between the dates of 02/09/2018 and 02/08/2023

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**Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (3) (ii)****Item 5.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting



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requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

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All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 6: Compliance Certification**  
Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)**

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
  - and
  - such additional requirements as may be specified

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elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department’s Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section  
 USEPA Region 2  
 Air Compliance Branch  
 290 Broadway  
 New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
 NYSDEC Region 8 Headquarters  
 6274 East Avon-Lima Road  
 Avon, NY 14414-9519

The address for the BQA is as follows:

NYSDEC  
 Bureau of Quality Assurance  
 625 Broadway  
 Albany, NY 12233-3258

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Monitoring Frequency: ANNUALLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2019.  
 Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 202-2.1**

**Item 7.1:**  
 The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
 Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

Monitoring Frequency: ANNUALLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 0 days after the reporting period.  
 The initial report is due 4/15/2019.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 1-1: Recordkeeping requirements**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 202-2.5**

**Item 1-1.1:**  
 (a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
  - (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.
- (b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

**Condition 9: Open Fires - Prohibitions**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 215.2**

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**Item 9.1:**

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

**Item 9.2**

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

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**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.**

**[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]**

**Condition 1-2: Maintenance of Equipment**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 1-2.1:**

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

**Condition 11: Recycling and Salvage**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 201-1.7**

**Item 11.1:**

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 201-1.8**

**Item 12.1:**

No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

**Condition 13: Exempt Sources - Proof of Eligibility**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 201-3.2 (a)**

**Item 13.1:**

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

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**Condition 14: Trivial Sources - Proof of Eligibility**  
Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement:6 NYCRR 201-3.3 (a)**

**Item 14.1:**

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

**Condition 15: Requirement to Provide Information**  
Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)**

**Item 15.1:**

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

**Condition 16: Right to Inspect**  
Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)**

**Item 16.1:**

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**Condition 17: Off Permit Changes**

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Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)****Item 17.1:**

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

**Condition 18: Required Emissions Tests**

Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement:6 NYCRR 202-1.1****Item 18.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

**Condition 19: Accidental release provisions.**

Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement:40 CFR Part 68****Item 19.1:**

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:



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1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center  
 C/O CSC  
 8400 Corporate Dr  
 Carrollton, Md. 20785

**Condition 20: Recycling and Emissions Reduction**  
 Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement:40CFR 82, Subpart F**

**Item 20.1:**  
 The permittee shall comply with all applicable provisions of 40 CFR Part 82.

**The following conditions are subject to annual compliance certification requirements for Title V permits only.**

**Condition 21: False statement**  
 Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement:6 NYCRR 200.3**

**Item 21.1:**  
 No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

**Condition 22: Compliance Schedule for Unpermitted Sources**  
 Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 22.1:**

1. The owner or operator of the facility shall notify the Department within 2 working days following the identification of an unpermitted source that is required to be included in the Title V permit.
2. Within 60 working days following the identification of an unpermitted source that is required to be included in the Title V permit,
  - i. The owner or operator shall provide notification to the Department in accordance with the Operational Flexibility Plan under 201-6.5(f) to incorporate any such emission sources and/or emission points that meet the Operational Flexibility Plan criteria; or
  - ii. The owner or operator shall submit a Title V permit modification application for unpermitted sources that do not meet the Operational Flexibility Plan criteria.

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**Condition 23: Emission Unit Definition**

Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 23.1(From Mod 1):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00040

Emission Unit Description:

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

Building(s): 014  
031

**Item 23.2(From Mod 1):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00069

Emission Unit Description:

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

Building(s): 012  
1049  
117

**Condition 24: Progress Reports Due Semiannually**

Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)**

**Item 24.1:**

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**Condition 1-3: Operational Flexibility**

Effective between the dates of 07/13/2022 and 02/08/2023

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**Applicable Federal Requirement:6 NYCRR 201-6.4 (f)****Item 1-3.1:**

A permit modification is not required for changes that are provided for in the permit. Such changes include approved alternate operating scenarios and changes that have been submitted and approved pursuant to an established operational flexibility protocol and the requirements of this section. Each such change cannot be a modification under any provision of Title I of the Clean Air Act or exceed, or cause the facility to exceed, an emissions cap or limitation in the permit. The facility owner or operator must incorporate all changes into any compliance certifications, record keeping, and/or reporting required by the permit.

**Condition 25: Compliance Certification  
Effective between the dates of 02/09/2018 and 02/08/2023****Applicable Federal Requirement:6 NYCRR 201-6.4 (f)****Item 25.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 25.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Plan

**I. Protocol Objective**

The objective of this condition is to maximize operational flexibility at the facility by building into the Title V permit the capability to make certain changes using a protocol. As provided under 6 NYCRR Part 201-6.4(f)(2), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.6.

**II. Protocol****A. Criteria**

1. Changes reviewed under this protocol shall be evaluated in accordance with the following criteria:

a. All underlying federal and state requirements with which the new or changed emission source must comply must exist in the Title V permit. Existing permit conditions may be amended to reference or include the new or changed emission source and any related information, and/or subject to DEC approval, new conditions proposed, to provide the appropriate monitoring parameters.

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b. Any new or changed emission source shall not be part of a source project that results in a significant net emissions increase that exceeds the New Source Review (NSR) thresholds identified in 6 NYCRR Part 231.

c. The facility shall not use the protocol to make physical changes or changes in the method of operation of existing emissions sources that would require a new or modified federally enforceable cap either to avoid major NSR requirements or to address and comply with other Clean Air Act requirements, such as RACT. Such changes must be addressed via the significant permit modification provisions.

**B. Notification Requirements for Changes Reviewed under the Protocol**

1. The facility shall notify the Department in writing of the proposed change.

2. Notifications made in accordance with this protocol will include the following documentation:

a. Identification of the Title V permit emission unit, process(es), emission sources and emission points affected by the proposed change with applicable revisions to the Emission Unit structure;

b. Description of the proposed change, including operating parameters;

c. Identification and description of emissions control technology;

d. Documentation of the project's, or emission source's, compliance with respect to all state and/or federally applicable requirements, including the following steps:

i. Calculate the emission rate potential and maximum projected actual annual emission rates for all contaminants affected by the change.

ii. Submit documentation of major NSR program non-applicability for NYSDEC review and approval.

iii. Identify and evaluate the applicability of all regulations likely to be triggered by the new or changed emission source.

iv. Propose any operating and record keeping procedures

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necessary to ensure compliance.

e. Any other relevant information used for the evaluation of the proposed project or emission source under the Protocol.

C. Review and Approval of Changes

1. The Department shall respond to the permittee in writing with a determination within 15 days of receipt of the notification of the permittee.

2. The Department may require a permit modification, in order to impose new applicable requirements or additional permit conditions if it determines that changes proposed pursuant to notification do not meet the criteria under II. A above or that the changes may have a significant air quality impact or be otherwise potentially significant under SEQRA (6 NYCRR Part 617).

3. The Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the proposed change, which may include potential air quality impacts and/or applicable requirements. The Department's determination shall include a listing of information required for further review, if necessary.

D. Additional Compliance Obligations for Changes Made Under this Protocol

1. Upon commencement of the change, the facility shall comply with all applicable requirements and permit conditions, including any amended or proposed in accordance with II.A.1.a above.

2. The facility shall provide with the semi-annual monitoring report, a summary of the changes made in accordance with this protocol and a statement of the compliance status of each. Changes reported should include all those made during the corresponding period and any earlier changes that have not yet been incorporated into the permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

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**Condition 1-4: Statement dates for emissions statements.**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 202-2.4 (a) (3)**

**Item 1-4.1:**

This facility is required to submit an annual emission statement electronically and these emissions statements must be submitted to the department as per the following schedule:

- (i) March 15th of each year for facilities with three or fewer processes listed in their Title V permit:
- (ii) March 31st of each year for facilities with four to six processes listed in their Title V permit:
- (iii) April 15th of each year for facilities with 7 to 12 processes listed in their Title V permit:
- (iv) April 30th of each year for facilities with 13 or more processes listed in their Title V permit.

**Condition 26: Submittal of Episode Action Plans**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR Part 207**

**Item 26.1:**

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

**Condition 81: Visible Emissions Limited**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 81.1:**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Condition 1-5: Compliance Certification**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-1.6 (a)**

**Item 1-5.1:**

The Compliance Certification activity will be performed for the facility:

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The Compliance Certification applies to:

Emission Unit: U-00040	Emission Point: 01413
Emission Unit: U-00069	Emission Point: 01210
Emission Unit: U-00069	Emission Point: 11706
Emission Unit: U-00069	Emission Point: 117A0

**Item 1-5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

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Parameter Monitored: OPACITY  
 Upper Permit Limit: 20 percent  
 Monitoring Frequency: SEMI-ANNUALLY  
 Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2023.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 1-6: Compliance Certification**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 1-6.1:**  
 The Compliance Certification activity will be performed for the Facility.

**Item 1-6.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
 Monitoring Description:

For emissions from the dispense tool the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants, or Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants, as applicable, for the environmental rating assigned to the contaminant by the department. Monitoring of actual emissions shall be required upon written request of the department.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2023.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 1-7: Compliance Certification**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-2.4 (b)**

**Item 1-7.1:**  
 The Compliance Certification activity will be performed for the facility:  
 The Compliance Certification applies to:

Emission Unit: U-00069                      Emission Point: 01210

**Item 1-7.2:**  
 Compliance Certification shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard of Part 212-2.4(b), the primary set of panel filters (Control Device 01201) and the backup set of panel filters (Control Device 01202) will be inspected during the two shutdown periods at the facility (within the two week period surrounding the July 4th holiday and within the two week period surrounding the December 25th holiday) and replaced as necessary. Records of filter changes shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-8: Compliance Certification**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable Federal Requirement: 6 NYCRR 212-2.4 (b)**

**Item 1-8.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00040

Emission Point: 01413

**Item 1-8.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/sdcf particulate standard of Part 212-2.4(b), the primary set of panel filters (Control Device 01401) and the backup set of HEPA filters (Control Device 01402) will be inspected semi-annually and replaced if necessary. Records of filter changes shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-9: Compliance Certification**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

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Facility DEC ID: 8261400823

**Applicable Federal Requirement:6 NYCRR 212-2.4 (b)****Item 1-9.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00069

Emission Point: 11706

Emission Unit: U-00069

Emission Point: 117A0

**Item 1-9.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping

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format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2023.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 1-10: Compliance Certification**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable Federal Requirement: 6 NYCRR 212-3.1 (c) (4) (iii)**

**Item 1-10.1:**

The Compliance Certification activity will be performed for the facility:  
 The Compliance Certification applies to:

Emission Unit: U-00040

Emission Point: 01413

**Item 1-10.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
 Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212 Reasonably Available Control Technology (RACT) requirements for the Pressurized Vessels and Weigh Scale (ES 014AJ) and Solution Delivery (ES 014AH), annual emissions of total VOCs from this emission point are limited to 0.34 tons per year, on a rolling twelve-month basis. This limit is based on the most recent RACT evaluation, dated May 2018.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. These records shall be retained on site for five years and made available to the Department upon request.

The RACT determination shall be re-evaluated and submitted to the Department every five years. The next such evaluation is due May 1, 2023.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2023.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 1-11: Compliance Certification**

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**Applicable Federal Requirement: 6 NYCRR 228-1.3 (a)**

**Item 1-11.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00040

Emission Point: 01426

Emission Unit: U-00040

Emission Point: 03101

**Item 1-11.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

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Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Monitoring Frequency: SEMI-ANNUALLY  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2023.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-12: Compliance Certification**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable Federal Requirement: 6 NYCRR 228-1.6 (d)**

**Item 1-12.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00040  
Process: J02

**Item 1-12.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

When an owner and/or operator of a coating line utilizes control equipment to comply with permit requirements or regulations, test methods acceptable to the department must be used to determine the overall removal efficiency during a required performance test.

(1) The overall removal efficiency may be determined by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment.

(2) For any control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment. The approved VOC CE test methods are contained in Part 228-1.6(d)(2) Table 'Approved VOC CE Test Methods'. Test methods 204 through 204F (M204 - M204F) are included in Appendix M of 40 CFR part 51 (see table 1, Section 200.9 of Title III). When the sampling and analysis methods described in this paragraph are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.

(3) Alternative CE protocols and test methods may be

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allowed if the data quality objective approach or lower confidence limit approach requirements are met in conjunction with the additional criteria set forth in the EPA guidance document entitled Guidelines for Determining Capture Efficiency (see table 1, Section 200.9 of Title III). The alternative CE protocols and test methods must be approved in advance by the department. Also, the multiple line testing procedures outlined in the above guidance document can be used to determine CE if the applicable criteria are satisfied. The multiple line testing CE protocols and test methods must be approved in advance by the department.

Parameter Monitored: DEGREE OF AIR CLEANING  
 Lower Permit Limit: 90 percent reduction  
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-13: Compliance Certification**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable Federal Requirement: 6 NYCRR 228-1.6 (f)**

**Item 1-13.1:**  
 The Compliance Certification activity will be performed for the Facility.

**Item 1-13.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:  
 In order to maintain compliance with 6NYCRR Part 228-1 Surface Coating VOC RACT requirements, Carestream shall operate the Regenerative Thermal Oxidizer (RTO)(Control Device 031AA) to achieve at least 90% removal efficiency. Continuous monitors of the combustion/retention chamber temperature of the RTO shall be installed, periodically calibrated, and operated at all times that the RTO is operating. Each three-hour block average combustion temperature within the RTO combustion chamber shall be continuously monitored and maintained at or above 1621 degrees F (the temperature established by the performance test conducted on December 8, 2008) at all times the surface coating machines are operating. Records shall be retained on site for five years and made available to the Department upon request.

Parameter Monitored: TEMPERATURE  
 Lower Permit Limit: 1621 degrees Fahrenheit  
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -  
SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

Subsequent reports are due every 6 calendar month(s).

**Condition 29: National Emission Standard for Asbestos**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:40CFR 61, NESHAP Subpart M**

**Item 29.1:**

The permittee shall comply with all applicable provisions of 40 CFR Part 61, Subpart M.

**Condition 30: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:40CFR 63.471(b)(2), Subpart T**

**Item 30.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000075-09-2      DICHLOROMETHANE

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must ensure that the total emissions of methylene chloride (MC) used in solvent cleaning machines at the facility are equal or less than 60,000 kg/yr, on a rolling 12-month basis, as required by 40CFR 63.471 Table 1. Compliance with the facility-wide emission limit shall be determined using the procedures in paragraph 63.471(c).

On the first operating day of every month, the owner/operator shall quantify the 12-month rolling total halogenated HAP solvent emissions for all cleaning machines at the facility, ET facility, in kilograms /yr, in accordance with the procedures in paragraphs 63.471(c)(1) through (5).

Any exceedence of this limit shall be reported as required in 40 CFR 63.468(h).

The owner/operator shall maintain records specified in paragraphs 63.471(e)(1) through (3) for a period of 5 years.

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Monitoring Frequency: MONTHLY  
 Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 7/30/2018.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 31: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:40CFR 63.471(h), Subpart T**

**Item 31.1:**  
 The Compliance Certification activity will be performed for the Facility.

**Item 31.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
 Monitoring Description:

The owner or operator shall submit a solvent emission report every year. This solvent emission report shall contain the requirements specified in paragraphs (1) through (3).

- (1) The average monthly solvent consumption for the affected facility in kilograms per month.
- (2) The 12-month rolling total solvent emission estimates calculated each month using the method as described in paragraph (c).
- (3) This report can be combined with the annual report required in 40CFR 63.468(f) and (g) into a single report for each facility.

Monitoring Frequency: ANNUALLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2019.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 32: Subpart A Requirements for Subpart JJJJ**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:40CFR 63.Tbl 2, Subpart JJJJ**

**Item 32.1:**  
 The applicant must comply with the requirements of 40 CFR 63 Subpart A, as specified in Table 2 of 40 CFR 63 Subpart JJJJ.

**Condition 1-14: Compliance Certification**  
**Effective between the dates of 07/13/2022 and 02/08/2023**



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**Applicable Federal Requirement: 40CFR 63.3370(a)(5), Subpart JJJJ****Item 1-14.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00040

**Item 1-14.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator demonstrating compliance with the emission standards in Subpart JJJJ by using a capture system and control device must demonstrate that:

(i) Overall organic HAP control efficiency is equal to 95 percent at an existing affected source and 98 percent at a new affected source on a monthly basis; or oxidizer outlet organic HAP concentration is no greater than 20 ppmv and capture efficiency is 100 percent; or operating parameters are continuously monitored by following the procedures set out in 40 CFR 63.3370(f) to determine compliance with 40 CFR 63.3320(b)(1) according to 40 CFR 63.3370(j) if using a solvent recovery device, or 40 CFR 63.3370(k) if using a control device and CPMS, or 40 CFR 63.3370(l) if using an oxidizer; or

(ii) Overall organic HAP emission rate does not exceed 0.2 kg organic HAP per kg coating solids for an existing affected source or 0.08 kg organic HAP per kg coating solids for a new affected source on a monthly average as-applied basis by following the procedures set out in 40 CFR 63.3370(g) to determine compliance with 40 CFR 63.3320(b)(3) according to 40 CFR 63.3370(j) if using a solvent recovery device, or 40 CFR 63.3370(l) if using an oxidizer; or

(iii) Overall organic HAP emission rate does not exceed 0.04 kg organic HAP per kg coating material for an existing affected source or 0.016 kg organic HAP per kg coating material for a new affected source on a monthly average as-applied basis by following the procedures set out in 40 CFR 63.3370(h) to determine compliance with 40 CFR 63.3320(b)(2) according to 40 CFR 63.3370(j) if using a solvent recovery device, or 40 CFR 63.3370(l) if using an oxidizer; or

(iv) Overall organic HAP emission rate does not exceed the calculated limit based on emission limitations by

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following the procedures set out in 40 CFR 63.3370(i), showing that the monthly organic HAP emission rate is less than the calculated equivalent allowable organic HAP emission rate (Equation 17 or 18 of 40 CFR 63.3370), and calculating the monthly organic HAP emission rate according to 40 CFR 63.3370(j) if using a solvent recovery device, or 40 CFR 63.3370(l) if using an oxidizer.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

Subsequent reports are due every 6 calendar month(s).

**\*\*\*\* Emission Unit Level \*\*\*\***

**Condition 33: Emission Point Definition By Emission Unit**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-6**

**Item 33.1(From Mod 1):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00040

Emission Point: 01413  
 Height (ft.): 38 Diameter (in.): 16  
 NYTMN (km.): 4786.235 NYTME (km.): 286.21 Building: 014

Emission Point: 01426  
 Height (ft.): 31 Diameter (in.): 38  
 NYTMN (km.): 4786.226 NYTME (km.): 286.202 Building: 014

Emission Point: 03101  
 Height (ft.): 45 Diameter (in.): 36  
 NYTMN (km.): 4785. NYTME (km.): 286. Building: 031

**Item 33.2(From Mod 1):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00069

Emission Point: 01210  
 Height (ft.): 1 Length (in.): 56 Width (in.): 26  
 NYTMN (km.): 4786.078 NYTME (km.): 286.376 Building: 012

Emission Point: 10492  
 Height (ft.): 37 Diameter (in.): 8  
 NYTMN (km.): 4786.542 NYTME (km.): 284.289 Building: 1049

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Emission Point: 11706  
 Height (ft.): 30 Diameter (in.): 14  
 NYTMN (km.): 4786.379 NYTME (km.): 284.974 Building: 117

Emission Point: 117A0  
 Height (ft.): 36 Diameter (in.): 10  
 NYTMN (km.): 4786.366 NYTME (km.): 284.972 Building: 117

**Item 33.3(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00040

Emission Point: 01425  
 Height (ft.): 20 Diameter (in.): 15  
 NYTMN (km.): 4786.248 NYTME (km.): 286.204 Building: 014

Emission Point: 01427  
 Height (ft.): 26 Diameter (in.): 2  
 NYTMN (km.): 4786.218 NYTME (km.): 286.205 Building: 014

Emission Point: 01428  
 Height (ft.): 33 Diameter (in.): 5  
 NYTMN (km.): 4786.232 NYTME (km.): 286.199 Building: 014

**Item 33.4(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00069

Emission Point: 10491  
 Height (ft.): 34 Diameter (in.): 13  
 NYTMN (km.): 4786.484 NYTME (km.): 284.225 Building: 1049

**Condition 34: Process Definition By Emission Unit**

**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 34.1(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040  
 Process: J02 Source Classification Code: 3-16-050-01  
 Process Description: Plastic/Paper Web Surface Coating Process.

Emission Source/Control: 031AA - Control  
 Control Type: THERMAL OXIDATION

Emission Source/Control: 031AB - Control  
 Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

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Emission Source/Control: 014AD - Process

Emission Source/Control: 014AU - Process

**Item 34.2(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040

Process: J03

Source Classification Code: 3-16-050-02

Process Description:

General process emission sources with NO<sub>x</sub> emissions less than 3 lb/hr ERP (i.e. ionization).

Emission Source/Control: 014AA - Process

Emission Source/Control: 014AR - Process

**Item 34.3(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040

Process: J06

Source Classification Code: 3-16-050-01

Process Description: R&D Web Surface Coating

Emission Source/Control: 031AA - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 031AB - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 014AD - Process

**Item 34.4(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040

Process: J08

Source Classification Code: 3-16-160-03

Process Description:

General process emission sources with VOC emission less than 3 lb/hr ERP (i.e. solution storage, handling, preparation & evaporation).

Emission Source/Control: 031AA - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 031AB - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 014AG - Process

Emission Source/Control: 014AT - Process

**Item 34.5(From Mod 1):**

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This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040  
 Process: J13 Source Classification Code: 3-16-160-03  
 Process Description:  
 General process emission sources with VOC emissions greater than 3 lb/hr ERP (i.e. solution storage, handling, preparation and evaporation)

Emission Source/Control: 01401 - Control  
 Control Type: FABRIC FILTER

Emission Source/Control: 01402 - Control  
 Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: 014AH - Process

Emission Source/Control: 014AJ - Process

Emission Source/Control: 014AV - Process

**Item 34.6(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00069  
 Process: J01 Source Classification Code: 3-16-160-03  
 Process Description:  
 Image enhancing screen manufacturing processes, including mixing, material processing, precipitation, and reduction operations.

Emission Source/Control: 11703 - Control  
 Control Type: FABRIC FILTER

Emission Source/Control: 117AB - Process

**Item 34.7(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00069  
 Process: J07 Source Classification Code: 3-16-160-03  
 Process Description:  
 General process emission sources (i.e. cleaning, sealing, printing, and product finishing/assembly).

Emission Source/Control: 01201 - Control  
 Control Type: MAT OR PANEL FILTER

Emission Source/Control: 01202 - Control  
 Control Type: MAT OR PANEL FILTER

Emission Source/Control: 012AD - Process

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Emission Source/Control: 1049A - Process

Emission Source/Control: 1049B - Process

Emission Source/Control: 1049C - Process

Emission Source/Control: 117AA - Process

**Item 34.8(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040

Process: J04

Source Classification Code: 3-16-120-02

Process Description:

Solvent cleaning operations not regulated by 40 CFR 63  
Subpart T or 6 NYCRR Part 226.

Emission Source/Control: 014AC - Process

Emission Source/Control: 014AE - Process

Emission Source/Control: 014AF - Process

Emission Source/Control: 014AK - Process

Emission Source/Control: 014AL - Process

Emission Source/Control: 014AM - Process

Emission Source/Control: 014AN - Process

Emission Source/Control: 014AP - Process

Emission Source/Control: 014AQ - Process

**Item 34.9(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040

Process: J05

Source Classification Code: 3-16-120-02

Process Description:

Halogenated solvent cleaning operations using solvent  
mixture, subject to 40 CFR 63 Subpart T

Emission Source/Control: 014AE - Process

Emission Source/Control: 014AF - Process

Emission Source/Control: 014AK - Process

Emission Source/Control: 014AL - Process

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Facility DEC ID: 8261400823

Emission Source/Control: 014AM - Process

Emission Source/Control: 014AN - Process

Emission Source/Control: 014AP - Process

Emission Source/Control: 014AQ - Process

**Item 34.10(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040

Process: J09

Source Classification Code: 3-16-120-02

Process Description:

Solvent Metal Cleaning operations using a solvent mixture, subject to 6 NYCRR Part 226

Emission Source/Control: 014AE - Process

Emission Source/Control: 014AF - Process

Emission Source/Control: 014AK - Process

Emission Source/Control: 014AL - Process

Emission Source/Control: 014AM - Process

Emission Source/Control: 014AN - Process

Emission Source/Control: 014AP - Process

Emission Source/Control: 014AQ - Process

Emission Source/Control: 12226 - Process

**Condition 35: Compliance Certification**

**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (1)**

**Item 35.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

**Item 35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission Unit U-00040 includes emission sources which are permitted under more than one operating scenario. Two

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different alternate operating scenarios; one defined by Surface Coating Processes J02 and J06, and the other defined by Solvent Cleaning Processes J04, J05 and J09. These processes share some of the same equipment, but operate the shared equipment in different ways or in a manner that triggers different applicable requirements.

Contemporaneously with making a change from one operating scenario to another, Carestream shall record the scenarios in a log in the operating area or retain appropriate time stamped operating records that indicate which scenario is in operation. Records shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 7/30/2018.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 36: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement: 6 NYCRR 212-1.5 (d)**

**Item 36.1:**

The Compliance Certification activity will be performed for the facility:  
 The Compliance Certification applies to:

Emission Unit: U-00040

Emission Unit: U-00069

**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In instances where a facility owner or operator can demonstrate to the satisfaction of the department that the facility owner or operator will apply BACT for criteria air contaminants or T-BACT for non-criteria air contaminants, the department may specify a less restrictive permissible emission rate or degree of air cleaning for the process emission source or emission point than required under Subpart 212-2 of this Part.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.



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The initial report is due 7/30/2018.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 37: Demonstrating compliance with Part 212 through the federal NSPS for the respective air contaminant Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-1.5 (e) (1)**

**Item 37.1:**

This Condition applies to:

Emission Unit: U00069

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**Condition 38: Compliance Certification Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-1.5 (e) (2)**

**Item 38.1:**

The Compliance Certification activity will be performed for the facility:  
 The Compliance Certification applies to:

Emission Unit: U-00069

**Item 38.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A process emission source subject to the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR Part 61 or Part 63 (see Table 1 of Section 200.9 of this Title) satisfies the requirements of this Part for the respective air contaminant regulated by the Federal standard if the facility owner or operator can demonstrate that the process emission source is in compliance with the relevant Federal regulation.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-15: Compliance Certification Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable Federal Requirement:40CFR 63.3400(c), Subpart JJJJ**

**Item 1-15.1:**

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The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-15.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a semiannual compliance report according to the following schedule:

The first compliance report is due no later than July 31 or January 31, whichever date follows the end of the calendar half immediately following the compliance date that is specified for the affected source in § 63.3330. Prior to the electronic template being available in CEDRI for one year, the report must be postmarked or delivered by the aforementioned dates. After the electronic template has been available in CEDRI for 1 year, the next full report must be submitted electronically as described in § 63.3400(h).

Each subsequent compliance report must be submitted electronically no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

The semiannual compliance report shall contain the following information:

- company name and address
- statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report
- date of report and beginning and ending dates of the reporting period
- if there were no deviations from any emission limitations (emission limit or operating limit) that apply to the facility, a statement that there were no deviations from the emission limitations during the reporting period, and that no continuous monitoring system was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
- for each deviation from an emission limitation (emission limit or operating limit) that applied to the facility and that occurs at an affected source where the facility is not using a continuous emission monitoring system to comply with the emission limitations, the compliance

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report must contain the total operating time of each affected source during the reporting period, information on the number, duration, and cause of deviations (including known causes), if applicable, and the corrective action taken, information on the number, duration, and cause for CPMS down time incidents, if applicable, other than down time associated with zero and span and other calibration checks.  
- for each deviation from an emission limit occurring at an affected source where a CEMS is used, the information in §63.3370(c)(2)(vi)(A)-(J) shall be submitted.

Monitoring Frequency: SEMI-ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2023.  
Subsequent reports are due every 6 calendar month(s).

**Condition 39: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 228-1.3 (b)**

**Item 39.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
Process: J02

**Item 39.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(1) Except as provided for in paragraph (2) of this subdivision, the owner or operator of any emission source subject to this Subpart must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the department within 90 days of receiving the request. Any facility required to perform the overall removal efficiency calculation set forth in Equation 2 of section 228-1.5(c) of this Subpart, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 90 percent. Any additional information required to determine compliance

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with this Part must be provided to the department in a format acceptable to the department. All records required by this paragraph must be maintained at the facility for a period of five years.

(2) Owners and operators of emission sources not subject to this Subpart as set forth in section 228-1.1(b)(9) or (13) of this Subpart, or those sources that are using coatings not subject to specific requirements of this Subpart as set forth in paragraph (e)(2) of this section, or section 228-1.4(b)(5)(iii)(e), (i) or (iv) of this Subpart, must maintain records on an as used basis. The records must include the relevant regulatory citation of each exemption and quantity of coating used. If the exemption criteria are based on VOC usage, the records must contain calculations and supplier/manufacturer material data sheets for verification of VOC usage. All records required by this paragraph must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 40: Surface Coating- Prohibitions**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 228-1.3 (c)**

**Item 40.1:**

This Condition applies to Emission Unit: U-00040  
Process: J02

**Item 40.2:**

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

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(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

**Condition 41: Compliance Certification**  
 Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)**

**Item 41.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
 Process: J02

**Item 41.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
 Monitoring Description:

- Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart must:
  - (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
  - (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
  - (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
  - (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns,

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- flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) clean hand held spray guns by one of the following:
  - (1) an enclosed spray gun cleaning system that is kept closed when not in use;
  - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
  - (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
  - (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 42: Overall removal efficiency calculation**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement: 6 NYCRR 228-1.5 (c)**

**Item 42.1:**

This Condition applies to Emission Unit: U-00040  
 Process: J02

**Item 42.2:**

The overall removal efficiency of an air cleaning device used as a control strategy must be determined, for every surface coating formulation, on a solids as applied basis using Equation 2 unless a 90 percent or greater overall removal efficiency is achieved by the air cleaning device. The air cleaning device must be designed and operated to provide, at a minimum, an overall removal efficiency of either 90 percent or as determined by Equation 2.

$$\eta = \left[ 1 - \left[ \frac{(\text{VOC})_c (\text{V}_n)_a}{(\text{VOC})_a (\text{V}_n)_c} \right] \right] \times 100 \quad \text{Equation 2}$$

Where:

$\eta$  is the overall removal efficiency.

$(\text{VOC})_c$  is the maximum permissible pounds of VOC per gallon of coating minus water and excluded compounds at application, as set forth in the tables of NYCRR Subpart 228-1.4

$(\text{VOC})_a$  is the VOC content of an as applied coating, expressed as pounds of VOC per gallon of coating minus water and excluded compounds.

$(\text{V}_n)_c$  is the volumetric fraction of solids, expressed as gallon of solids per gallon of coating minus water and excluded compounds, in a compliant coating expressed as:

$$(\text{V}_n)_c = 1 - (\text{V}_v)_c \quad \text{Equation 3}$$

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$(V_v)_c$  is the volumetric fraction of VOC, expressed as gallon of VOC per gallon of coating minus water and excluded compounds, in a compliant coating expressed as:

$$(V_v)_c = \left[ \frac{(VOC)_c}{d_{VOC}} \right] \quad \text{Equation 4}$$

$(V_n)_a$  is the volumetric fraction of solids, expressed as gallon of solids per gallon of coating minus water and excluded compounds, in an as applied coating expressed as:

$$(V_n)_a = 1 - (V_v)_a \quad \text{Equation 5}$$

$(V_v)_a$  is the volumetric fraction of VOC, expressed as gallon of VOC per gallon of coating minus water and excluded compounds, in an as applied coating expressed as:

$$(V_v)_a = \left[ \frac{(VOC)_a}{d_{VOC}} \right] \quad \text{Equation 6}$$

$d_{VOC}$  is the density of VOC as applied, ‘i.e.’, total volatiles minus water and



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excluded compounds, in pounds of VOC per gallon of VOC.

**Condition 44: Compliance Certification**  
Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement: 6 NYCRR 228-1.6 (h)**

**Item 44.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Process: J02

**Item 44.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any information or record showing noncompliance with the requirements of 228-1 'Surface Coating Processes' must be reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 46: Applicability**  
Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement: 40CFR 63.460(b), Subpart T**

**Item 46.1:**

This Condition applies to Emission Unit: U-00040  
Process: J05

**Item 46.2:**

Owners or operators of affected sources subject to 40CFR63 Subpart T must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Appendix B of Subpart T. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

**Condition 47: Batch Cold Cleaning Machine Standards**  
Effective between the dates of 02/09/2018 and 02/08/2023

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**Applicable Federal Requirement:40CFR 63.462(a)(2), Subpart T**

**Item 47.1:**

This Condition applies to Emission Unit: U-00040  
Process: J05

**Item 47.2:**

Each owner/operator of an immersion batch cold cleaning machine shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and have a freeboard ratio of 0.75 of greater.

**Condition 48: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:40CFR 63.462(c), Subpart T**

**Item 48.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040  
Process: J05

**Item 48.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a batch cold solvent cleaning machine complying with paragraph 40 CFR 63.642 (a)(2) or (b) shall comply with the work and operational practice requirements specified in paragraphs (1) through (9) listed below:

- (1) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (2) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
- (3) The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
- (4) The owner or operator shall ensure that the solvent level does not exceed the fill line.
- (5) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered

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containers meeting the requirements of paragraph (c)(1) of this section.

(6) When an air- or pump-agitated solvent bath is used, the owner or operator shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.

(7) The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.

(8) Except as provided in paragraph (c)(9) of this section, sponges, fabric, wood, and paper products shall not be cleaned.

(9) The prohibition in paragraph (c)(8) of this section does not apply to the cleaning of porous materials that are part of polychlorinated biphenyl (PCB) laden transformers if those transformers are handled throughout the cleaning process and disposed of in compliance with an approved PCB disposal permit issued in accordance with the Toxic Substances Control Act.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 49: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement: 40CFR 63.471(c), Subpart T**

**Item 49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Process: J05

**Item 49.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall on the first operating day of every month, demonstrate compliance with the applicable

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facility-wide emission limit on a 12-month rolling total basis using the procedures in paragraphs 40CFR 63.471(c)(1) through (5). For purposes of this paragraph, EACH SOLVENT CLEANING MACHINE means each solvent cleaning machine that is part of an affected facility regulated by this section.

(1) The owner or operator shall, on the first operating day of every month, ensure that each solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soiled materials. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified in paragraphs (2) and (3). The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

(2) The owner or operator shall, on the first operating day of the month, using the records of all solvent additions and deletions for the previous month, determine solvent emissions (Eunit) from each solvent cleaning machine using equation 10 in 40CFR 63.471

(3) The owner or operator shall, on the first operating day of the month, determine SSR using the method specified in paragraph (i) or (ii).

(i) From tests conducted using EPA reference method 25d.

(ii) By engineering calculations included in the compliance report.

(4) The owner or operator shall on the first operating day of the month, after 12 months of emissions data are available, determine the 12-month rolling total emissions, ETunit, for the 12-month period ending with the most recent month using equation 11 in 40CFR 63.471

(5) The owner or operator shall on the first operating day of the month, after 12 months of emissions data are available, determine the 12-month rolling total emissions, ETfacility, for the 12-month period ending with the most recent month using equation 12 in 40CFR 63.471

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.  
The initial report is due 7/30/2018.  
Subsequent reports are due every 6 calendar month(s).

**Condition 50: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement: 6 NYCRR Part 226**

**Item 50.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Process: J09

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 50.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for Cold Cleaning Degreasers

**A. Equipment Specifications**

The following types of control equipment must be used when conducting cold cleaning degreasing, solvent metal cleaning when the internal volume of the unit is greater than 2 gallons:

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if practical. When cleaning a part that isn't practical to drain under cover, the part shall be drained in a way which minimizes emissions of VOC.
- (3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. This does not apply to remote reservoir degreasers.
- (4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C.

**B. Operating Requirements:**

When cold cleaning, the clean parts must be drained at least 15 seconds or until dripping ceases.

**C. General Requirements:**

A Person conducting solvent metal cleaning must:

- (1) Store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.

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- (2) Maintain equipment to minimize leaks and fugitive emissions.
- (3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
- (4) Keep the degreaser cover closed except when:
  - (a) parts are being placed into or being removed from the degreaser;
  - (b) adding or removing solvent from the degreaser;
  - (c) no solvent is in the degreaser; or
  - (d) when manually cleaning metal parts in the cold cleaning degreaser.
- (5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
- (6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.
- (7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this requirement.
  - (a) the name and address of the solvent supplier;
  - (b) the type of solvent including the product or vendor identification number; and
  - (c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 F).

**D. Record Keeping Requirements:**  
 Deviations from these requirements shall be recorded in a log maintained for this purpose within the corresponding operating area and shall be appropriately identified in the semi-annual monitoring report. In addition, the log must note whether the cold cleaner is equipped with an internal drain as specified in item A(2) above.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 7/30/2018.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 52: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement: 6 NYCRR 212-2.1 (b)**

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**Item 52.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040                      Emission Point: 01413  
 Process: J08

Regulated Contaminant(s):  
 CAS No: 000067-64-1              DIMETHYL KETONE

**Item 52.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212-2.1(b) emissions of dimethyl ketone (acetone) from Emission Point 01413, associated with the phospor dispersion making process, shall be limited to 0.13 tons per year (tpy) on a rolling twelve month basis. This limit is based on the most recent BACT evaluation dated, May 2014, and information provided in the Notification of Change Under Title V Operational Flexibility Plan letter dated December 31, 2009, and information provided in the September 27, 2016 Title V renewal application.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. Records shall be kept on site for five years and made available to the Department upon request.

The BACT demonstration shall be re-evaluated and submitted to the Department every five years.

Monitoring Frequency: MONTHLY  
 Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 7/30/2018.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 53: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 53.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040                      Emission Point: 01425

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Regulated Contaminant(s):

CAS No: 000067-64-1 DIMETHYL KETONE

**Item 53.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212-2.1(b) emissions of dimethyl ketone (acetone) from Emission Point 01425, associated with the solvent cleaning tanks, shall be limited to 2.55 tons per year (tpy) on a rolling twelve month basis. This limit is based on the most recent BACT evaluation dated, May 2014, and information provided in the September 27, 2016 Title V renewal 2 modification application. Additionally, emissions of dichloromethane are subject to the requirements of the Halogenated Solvent Cleaning MACT (40 CFR 63 Subpart T).

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. Records shall be kept on site for five years and made available to the Department upon request.

The BACT demonstration shall be re-evaluated and submitted to the Department every five years.

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 54: Compliance Certification****Effective between the dates of 02/09/2018 and 02/08/2023****Applicable Federal Requirement: 6 NYCRR 212-2.1 (b)****Item 54.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 01425

Process: J05

**Item 54.2:**

Compliance Certification shall include the following monitoring:



Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 3 or Table 4 of 6 NYCRR Part 212-2.3 for the environmental rating issued by the commissioner

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 55: Compliance Certification**

**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 55.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 01426

Process: J02

Emission Source: 014AU

**Item 55.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For emissions from the coating room exhaust the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants, or Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants, as applicable, for the environmental rating assigned to the contaminant by the department. Monitoring of actual emissions shall be required upon written request of the department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 56: Compliance Certification**

**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 56.1:**

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

The Compliance Certification activity will be performed for:

Emission Unit: U-00040                      Emission Point: 01427  
 Process: J08

Regulated Contaminant(s):  
 CAS No: 000075-09-2                      DICHLOROMETHANE

**Item 56.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212-2.1(b) emissions of dichloromethane from Emission Point 01427, associated with six solution preparation vessels, shall be limited to 150 lbs per year on a rolling twelve month basis. This limit is based on the most recent BACT evaluation dated, May 2014, and information provided in a Notification of Change Under Title V Operational Flexibility Plan letter dated December 31, 2009, and information provided in the September 27, 2016 Title V renewal 2 modification application.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. Records shall be kept on site for five years and made available to the Department upon request.

The BACT demonstration shall be re-evaluated and submitted to the Department every five years.

Monitoring Frequency: MONTHLY  
 Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 7/30/2018.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 57: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 57.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040                      Emission Point: 01428

**Item 57.2:**

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For general process emissions from the grid ionizer and corona discharge treatment the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants, or Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants, as applicable, for the environmental rating assigned to the contaminant by the department. Monitoring of actual emissions shall be required upon written request of the department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 58: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement: 6 NYCRR 212-2.1 (b)**

**Item 58.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101

Regulated Contaminant(s):

CAS No: 007647-01-0

HYDROGEN CHLORIDE

**Item 58.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212-2.1(b) Carestream must operate the Scrubber (Control Device 031AB) at all times the surface coating machines are operating with a minimum flow rate of 37 gallons per minute. Scrubber flow rate shall be monitored and recorded weekly. Records shall be maintained on site and made available to the Department upon request.

Parameter Monitored: FLOW RATE

Lower Permit Limit: 37 gallons per minute

Monitoring Frequency: WEEKLY

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 59: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 59.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101

Regulated Contaminant(s):

CAS No: 007647-01-0

HYDROGEN CHLORIDE

**Item 59.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212-2.1(b) Carestream must operate the Scrubber (Control Device 031AB) at all times the surface coating machines are operating within a pH range between 5.0 and 13.5. pH shall be monitored and recorded weekly. Records shall be maintained on site and made available to the Department upon request.

Parameter Monitored: PH

Lower Permit Limit: 5.0 pH (STANDARD) units

Upper Permit Limit: 13.5 pH (STANDARD) units

Monitoring Frequency: WEEKLY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED  
RANGE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 60: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 60.1:**

The Compliance Certification activity will be performed for:

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Emission Unit: U-00040

Emission Point: 03101

Regulated Contaminant(s):

CAS No: 000064-17-5	ETHYL ALCOHOL (ETHANOL)
CAS No: 000071-23-8	PROPANOL
CAS No: 000079-20-9	ACETIC ACID, METHYL ESTER
CAS No: 000109-99-9	TETRAHYDROFURAN
CAS No: 000110-82-7	CYCLOHEXANE
CAS No: 000141-78-6	ETHYL ACETATE
CAS No: 000142-82-5	N-HEPTANE
CAS No: 000067-64-1	DIMETHYL KETONE

**Item 60.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212-2.1(b) Carestream must operate the Regenerative Thermal Oxidizer (RTO) (Control Device 031AA) and Scrubber (Control Device 031AB) at all times the surface coating machines are operating.

In accordance with Part 212-2.3 (Table 4), the minimum degree of air cleaning for applicable contaminants is as follows:

dimethyl ketone (acetone): 75%  
methyl acetate: 90%  
n-propanol: 75%  
tetrahydrofuran: 90%  
ethanol: 75%  
ethyl acetate: 90%  
cyclohexane: 75%  
heptane: 90%

In order to maintain compliance with these air cleaning requirements, the temperature in the combustion zone must be continuously monitored and maintained at a minimum of 1621 degrees F (3-hour block average) at all times the surface coating machines are operating, as demonstrated during the December 8, 2008 performance test.

Records shall be maintained on site and made available to the Department upon request.

Parameter Monitored: TEMPERATURE  
Lower Permit Limit: 1621 degrees Fahrenheit  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 3-HOUR BLOCK AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

The initial report is due 7/30/2018.  
Subsequent reports are due every 6 calendar month(s).

**Condition 62: Compliance Certification**  
Effective between the dates of 02/09/2018 and 02/08/2023

**Applicable Federal Requirement: 40CFR 63.3350(e), Subpart JJJJ**

**Item 62.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040                      Emission Point: 03101  
Process: J02                                      Emission Source: 014AD

Regulated Contaminant(s):  
CAS No: 0NY100-00-0      TOTAL HAP

**Item 62.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the emission standard in §63.3320(b)(1) for 95% reduction of HAPs through the use of a capture system and control device for the surface coating operations (ES 014AD), the facility must install, operate, and maintain each continuous parameter monitoring system (CPMS) specified in §63.3350(e)(9), (10) and §63.3350(f) as follows:

(1) Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. There must be a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.

(2) There must be valid data from at least 90 percent of the hours during which the process operated.

(3) Facility must determine the hourly average of all recorded readings according to paragraphs (3)(i) and (ii) below.

(i) To calculate a valid hourly value, there must be at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.

(ii) Provided all of the readings recorded in accordance with paragraph (3) clearly demonstrate continuous compliance with the standard that applies to the facility, then the facility is not required to determine the hourly average of all recorded readings.

(4) Facility must determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, at all times the surface coating machines are operating, there must be at least two of three of the hourly averages

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for that period using only average values that are based on valid data (i.e., not from out-of-control periods).

(5) Facility must record the results of each inspection, calibration, and validation check of the CPMS.

(6) At all times, facility must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(7) Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), facility must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in § 63.3370. Facility must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(8) Any averaging period for which there is no valid monitoring data and such data are required constitutes a deviation, and the facility must notify the Administrator in accordance with § 63.3400(c).

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 63: Compliance Certification**

**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:40CFR 63.3350(e), Subpart JJJJ**

**Item 63.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101

Process: J02

Emission Source: 014AD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

**Item 63.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to comply with the emission standard in §63.3320(b)(1) for 95% reduction of HAPs through the use of a capture system and control device for the surface coating operations (ES 014AD), the facility must maintain a minimum combustion zone temperature of 1621 degrees F (3-hour block average) at all times the surface coating machines are operating, as demonstrated during the December 8, 2008 performance test.

In accordance with §63.3350(e)(9), a facility using a non-catalytic oxidizer to comply must install, calibrate, maintain and operate a continuous temperature monitoring system according to the manufacturer's specifications and the requirements of §63.3350(e)(1)-(8). The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart records, data logger, or temperature indicator must be replaced. The facility must replace the equipment whether the facility chooses not to perform the calibration or the equipment cannot be calibrated properly.

The temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of +/-1% of the temperature being monitored in degrees Celsius, or +/-1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1621 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 64: Compliance Certification****Effective between the dates of 02/09/2018 and 02/08/2023****Applicable Federal Requirement:40CFR 63.3350(f), Subpart JJJJ****Item 64.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101



Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

Process: J02

Emission Source: 014AD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 64.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to comply with the emission standard in §63.3320(b)(1) for 95% reduction of HAPs through the use of a capture system and control device for the surface coating operations (ES 014AD), the facility must develop a site-specific monitoring plan for these capture systems. The plan must be maintained on site and made available to the Department upon request.

The monitoring plan must:

- 1) identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained;
- 2) explain why this parameter is appropriate for demonstrating ongoing compliance, and
- 3) identify the specific monitoring procedures.

The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in §63.3320. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

The facility must monitor the capture system in accordance with the site-specific monitoring plan.

Any deviation from the operating parameter value or range of values will be considered a deviation from the emission limit.

The facility must review and update the capture system monitoring plan at least annually.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 68: Compliance Certification**

**Effective between the dates of 02/09/2018 and 02/08/2023**

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

**Applicable Federal Requirement: 40CFR 63.3400(c), Subpart JJJJ****Item 68.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040                      Emission Point: 03101  
Process: J02                                      Emission Source: 014AD

Regulated Contaminant(s):  
CAS No: 0NY100-00-0      TOTAL HAP

**Item 68.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a semiannual compliance report according to the following schedule:

The first compliance report must cover the period beginning on the compliance date that is specified for the affected source in §63.3330 and ending on June 30 or December 31, whichever date is the first date following the end of the calendar half immediately following the compliance date. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the calendar half immediately following the compliance date.

Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual period from July 1 to December 31. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

The semiannual compliance report shall contain the following information:

- company name and address
- statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report
- date of report and beginning and ending dates of the reporting period
- if there were no deviations from any emission limitations (emission limit or operating limit) that apply to the facility, a statement that there were no deviations from the emission limitations during the reporting period, and that no continuous monitoring system was inoperative,

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inactive, malfunctioning, out-of-control, repaired, or adjusted.  
 - for each deviation from an emission limitation (emission limit or operating limit) that applied to the facility and that occurs at an affected source where the facility is not using a continuous emission monitoring system to comply with the emission limitations, the compliance report must contain the total operating time of each affected source during the reporting period, information on the number, duration, and cause of deviations (including known causes), if applicable, and the corrective action taken, information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.  
 - for each deviation from an emission limit occurring at an affected source where a CEMS is used, the information in §63.3370(c)(2)(vi)(A)-(J) shall be submitted.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 7/30/2018.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 70: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:40CFR 63.3410, Subpart JJJJ**

**Item 70.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00040	Emission Point: 03101
Process: J02	Emission Source: 014AD

Regulated Contaminant(s):  
 CAS No: 0NY100-00-0 TOTAL HAP

**Item 70.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of an affected source must maintain the following records on a monthly basis for at least five years after each occurrence that requires recordkeeping. The latest two years must be kept on site and readily available, and the remaining 3 years may be kept off-site or on computer or other means as specified in §63.10(b)(1):

- The records specified in §63.10(b)(2) of all measurements needed to demonstrate compliance with Subpart

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- JJJJ, including continuous emission monitor data in accordance with §63.3350(d)
- control device and capture system operating parameter data in accordance with §63.3350(c),(e), and (f)
- organic HAP content data for the purpose of demonstrating compliance in accordance with §63.3360(c)
- volatile matter and coating solids content data for the purpose of demonstrating compliance with §63.3360(d)
- overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results – in accordance with §63.3360(e) and (f)
- material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with §63.3370(b), (c), and (d)
- records specified in §63.10(c) for each continuous monitoring system operated by the owner/operator in accordance with §63.3350(b)
- records of all liquid-liquid material balances performed in accordance with §63.3370.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 73: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 73.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00069

Emission Point: 10491

**Item 73.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For general process emissions from cleaning, sealing, printing and product finishing and assembly operations the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants, or Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants, as applicable, for the environmental rating assigned to the contaminant by the

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Facility DEC ID: 8261400823

department. Monitoring of actual emissions shall be required upon written request of the department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 74: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 74.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00069

Emission Point: 11706

**Item 74.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For general process emissions from the powder handling and precipitation operations the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants, or Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants, as applicable, for the environmental rating assigned to the contaminant by the department. Monitoring of actual emissions shall be required upon written request of the department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 76: Compliance Certification**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 76.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00069

Emission Point: 117A0

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823

**Item 76.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For general process emissions from the production grinding operations the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants, or Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants, as applicable, for the environmental rating assigned to the contaminant by the department. Monitoring of actual emissions shall be required upon written request of the department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2018.

Subsequent reports are due every 6 calendar month(s).

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Facility DEC ID: 8261400823

**STATE ONLY ENFORCEABLE CONDITIONS****\*\*\*\* Facility Level \*\*\*\*****NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability**

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

An emergency, as defined in 6 NYCRR 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 demonstrate, 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 facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction provision contained in any applicable requirement.

**Item B: 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

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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.

#### STATE ONLY APPLICABLE REQUIREMENTS

**The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.**

**Condition 78: Reporting Requirements for State-Only Enforceable Conditions**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable State Requirement:ECL 19-0301**

**Item 78.1:**

Notwithstanding the reporting requirements found at Condition #5 of this Permit , for those state only enforceable conditions with a reporting requirement of "Upon request by regulatory agency", the permittee is not obligated to include a statement regarding monitoring, record keeping, or deviations in the semi-annual report. Nothing contained in this paragraph shall impair or prejudice any rights the Department may have to seek information from the permittee regarding compliance with the State-Only enforceable conditions.

**Condition 79: Contaminant List**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable State Requirement:ECL 19-0301**

**Item 79.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000064-17-5  
Name: ETHYL ALCOHOL (ETHANOL)

CAS No: 000067-64-1  
Name: DIMETHYL KETONE

CAS No: 000071-23-8



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Name: PROPANOL

CAS No: 000075-09-2

Name: DICHLOROMETHANE

CAS No: 000079-20-9

Name: ACETIC ACID, METHYL ESTER

CAS No: 000101-68-8

Name: METHYLENE BISPHENYL ISOCYANATE

CAS No: 000109-99-9

Name: TETRAHYDROFURAN

CAS No: 000110-82-7

Name: CYCLOHEXANE

CAS No: 000141-78-6

Name: ETHYL ACETATE

CAS No: 000142-82-5

Name: N-HEPTANE

CAS No: 007647-01-0

Name: HYDROGEN CHLORIDE

CAS No: 0NY100-00-0

Name: TOTAL HAP

CAS No: 0NY998-00-0

Name: VOC

**Condition 1-16: Malfunctions and Start-up/Shutdown Activities**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable State Requirement: 6 NYCRR 201-1.4**

**Item 1-16.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit

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additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 1-17: CLCPA Applicability**  
**Effective between the dates of 07/13/2022 and 02/08/2023**

**Applicable State Requirement:6 NYCRR 201-6.5 (a)**

**Item 1-17.1:**

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

**Condition 27: Air pollution prohibited**  
**Effective between the dates of 02/09/2018 and 02/08/2023**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 27.1:**

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. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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**Condition 1-18: Compliance Demonstration**

Effective between the dates of 07/13/2022 and 02/08/2023

**Applicable State Requirement: 6 NYCRR 212-2.1 (a)**

**Item 1-18.1:**

The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration applies to:

Emission Unit: U-00069

Emission Point: 10492

Process: J07

Emission Source: 1049C

Regulated Contaminant(s):

CAS No: 000101-68-8

METHYLENE BISPHENYL ISOCYANATE

**Item 1-18.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For an air contaminant listed in section 212-2.2 table 2 – high toxicity air contaminant list, the facility owner or operator shall either limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC; or demonstrate compliance with the air cleaning requirements for the HTAC as specified in subdivision 212-2.3(b), table 4 – degree of air cleaning required for non-criteria air contaminants, of this Subpart for the environmental rating assigned to the contaminant by the Department.

The facility shall certify semi-annually that there were no changes made to the operation of these emission sources or the air pollution control equipment, that could result in increases in emissions or increases in predicted off-site ambient concentrations. Monitoring of actual emissions shall be required upon written request of the department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

Subsequent reports are due every 6 calendar month(s).

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