New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 8-2614-00205/01801
Renewal Number: 1
Modification Number: 1 12/30/2016

Facility Identification Data
Name: EASTMAN BUSINESS PARK
Address: 1999 LAKE AVE
ROCHESTER, NY 14652

Owner/Firm
Name: EASTMAN KODAK CO
Address: 343 STATE ST
ROCHESTER, NY 14650, USA
Owner Classification: Corporation/Partnership

Permit Contacts
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Permit Description

Introduction

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

Summary Description of Proposed Project
This modification of Kodak's Title V Permit (Renewal 1) is for the purpose of:

1) Removing the New Source Review limitation for Emission Unit U-00085;

2) Updating permit language to reflect numerous operational changes and deletions approved under the Operational Flexibility provisions;

3) Updating rule citations and monitoring conditions to reflect the changes to 6 NYCRR Part 201 and Subpart 228-1;

4) Updating conditions for existing RACT and BACT determinations to reflect the most recent re-evaluations of compliance options; and

5) Documenting the surrender of VOC Emission Reduction Credits (ERCs).

Additional details of the changes follow.

The VOC cap on Emission Unit U-00085, intended to ensure project emissions from the J9 Machine area remained below the 40 tpy New Source Review applicability threshold, has been eliminated in this Draft permit. Kodak requested the removal of the cap in an October 30, 2012 application for significant modification of their Title V Permit. The cap was established when the "J9 Machine" in Bldg 59 was upgraded in 2002. As described in Kodak's application, the majority of sources related to this project, including the "J9 Machine" have been shut down. Two remaining sources are chemical preparation and weighing operations with a potential to emit (PTE) VOC less than 1 tpy. Because the PTE is now well below the 40 tpy NSR applicability threshold, the Department agrees that for the purpose of streamlining the permit and reducing unnecessary record keeping, the cap should be eliminated from the permit.

This latest Title V permit includes 22 Emission Units (EU) compared to the 29 EU in the last version (Renewal 1). A few Emission Units have been removed following their transfer to a new owner: U-00020 (Truesense Imaging) and U-00008 and F-AC002 (RED-Rochester). Removal of EU U-00011 and U-00061 reflect the decommissioning of the acetate film production area (Bldg 53 & 54). Also, Kodak has been re-organizing and consolidating equipment and the corresponding Emission Units in the permit. For example, remaining equipment previously permitted under EU U-00045 is now included in EU U-00084. EU U-00048 (small scale synthetic chemicals operations) has been eliminated with the few remaining sources moved in to Bldg 337 (EU U-00060). One new emission unit, EU U-00090, has been added for the permitting of the new Bldg 326 Functional Printing operations. A minor modification for the new EU U-00090 was originally approved on August 15, 2013 and updated via Operational Flexibility notifications dated September 30, 2012, December 4, 2013 and January 29, 2014.

New and revised monitoring conditions have been included for the Bldg 120 methanol/ water scrubber system (EU U-00021) to demonstrate compliance with the MON MACT rule (40 CFR 63 Subpart FFFF). Testing conducted in November 2013 showed an overall removal efficiency greater than the required 95% control for recovery devices under the MACT rule. The MON MACT control requirements have been added to the permit in anticipation of new solvent recovery streams. Emission sources controlled by the scrubber system are currently subject to Part 212 VOC RACT and 212.4 BACT control requirements which were revised for consistency with the new more stringent MACT conditions.

On September 4, 2013 Kodak submitted a Subpart 228-1 Compliance Plan in accordance with the provisions of the June 2013 revisions of the rule. As a result of the rule changes, many of the rule citations in the permit have changed and in several cases Kodak's options for individual source compliance have changed. Pursuant to subdivision 228-1.5(d) of the revised rule, Kodak requested a new Coating System for Bldg 48 Coating Machine. The source specific Coating System was approved on February 28, 2014 and is included under EU U-00047 of the permit.

Some RACT and BACT determinations which have resulted in alternate limits incorporated into Kodak's Title V permit have undergone the required periodic re-evaluation since the Renewal Permit was issued on January 1, 2012. Several of the previously issued RACT and BACT limits were determined to be no longer necessary due to elimination of the applicable source, transfer to a new owner, or changes to the rule. Alternative limits for RACT and BACT compliance continue to be included in this Draft permit for the Emission Units listed below:

For Part 212.10 VOC RACT:

EU U-00012, U-00021, U-00047, U-00053, U-00056, U-00060 and U-00084

For Part 233.3 VOC RACT:

EU U-000053 and U00060

For Part 228-1 VOC RACT:

EU U-00084

For Part 212.4 BACT:

EU U-00021, U-00047, U-00053, U-00056, U-00060, U-00084.

None of the VOC RACT limits have changed from the previously permitted limits. Regarding the Part 212 BACT limits, a minor modification was proposed to increase the Part 212 BACT limit for acetone and methyl acetate at EP 308B5 (EU U-00084) from 4.38 tons per year to 25 tons per year. Based on an evaluation submitted in March 2014, no further emission reductions are both technically and economically feasible. The change will allow the coating machine, which has been in use for R&D coating only, to be used for new business. All other Part 212 BACT alternate limits remain unchanged in this permit.

Revisions were made to conditions which documented Kodak's established ERCs under 6 NYCRR 231-2.12. In accordance with a Consent Agreement and Final Order (CAFO)(CAA-02-2011-1209) issued by the USEPA in November 2011, Kodak agreed to retire the 62.1 tons of NYS VOC ERCs documented in the permit. The Department was asked to add language to the permit stating that these ERCs were surrendered. Therefore, the permit conditions have each been revised as requested.

Attainment Status
EASTMAN BUSINESS PARK is located in the town of ROCHESTER in the county of MONROE.
The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT

Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:
The Kodak Park site is a large, integrated manufacturing plant producing photographic films, papers, and synthetic organic chemicals. The facility is located on approximately 1,300 acres in north central Monroe County. The developed portion of the site is bounded by the Genesee River to the east, Route 104/Eastman Ave to the north, Ridgeway Avenue to the south, and Route 390 to the west.

Permit Structure and Description of Operations
The Title V permit for EASTMAN BUSINESS PARK
is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:
combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

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

Emission unit U00012 - MANUFACTURE OF FILM COATING SOLUTIONS, DISPERSIONS AND EMULSIONS, INCLUDING DISPENSING, MIXING, WASHING, AND STORAGE OPERATIONS, WITH INCIDENTAL INDOOR FUGITIVE EMISSIONS.

Emission unit U00012 is associated with the following emission points (EP):
03051, 03054, 03055, 03057, 03059, 03062, 03078, 030L0, 030L1, 030L2, 030L3, 030L4, 030M5, 030M6, 030M7, 030M9, 030N1, 030N4, 030N6, 030P0, 030P1, 030P8, 04690
Process: P03 is located at Building 030 -

Process: P04 is located at Building 030 -

Process: P14 is located at Building 030 -

Process: P15 is located at Building 030 -

Emission unit U00083 - SOURCES IN BUILDINGS 81, 82 AND 205 ASSOCIATED WITH MISCELLANEOUS MANUFACTURING OPERATIONS.

Emission unit U00083 is associated with the following emission points (EP):
08116, 08130, 08132, 08133, 08134, 08135, 08138, 082X8, 205C5
Process: Y10 is located at Building 081 -

Process: Y14 is located at and Bldg 205, Building 082 - BUILDING 82 & 205 ELECTRO PHOTOGRAPHIC MATERIALS MANUFACTURING, RELATED R&D ACTIVITIES AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00090 - TOUCH SCREEN MANUFACTURING OPERATIONS IN B-326, INCLUDING PLATE MASTERING, FLEXOGRAPHIC PRINTING AND PLATING, WITH INCIDENTAL INDOOR FUGITIVE EMISSIONS.

Emission unit U00090 is associated with the following emission points (EP):
326C5, 326C6, 326C7, 326C8, 326C9, 326D0, 326D1, 326D2, 326D3
Process: Z01 is located at Building 326 - GENERAL PROCESS EMISSION SOURCES

Process: Z02 is located at Building 326 - FLEXOGRAPHIC PRINTING OPERATIONS SUBJECT TO PART 234

Process: Z03 is located at Building 326 - STORAGE VESSELS SUBJECT TO PART 229

Emission unit U00025 - BUILDING 305 SYNTHETIC CHEMICAL DIVISION GENERAL PROCESS EMISSION SOURCES INCLUDING CHEMICAL MANUFACTURING OPERATIONS WITH INCIDENTAL FUGITIVE EMISSIONS.

Emission unit U00025 is associated with the following emission points (EP):
30502, 30503, 30504
Process: S05 is located at Building 305 - CHEMICAL MANUFACTURING <3.0 LB/HR VOC ERP

Emission unit U00085 - BUILDING 59 WEB COATING OF PLASTIC/PAPER AND RELATED SUPPORT OPERATIONS, INCLUDING INCIDENTAL FUGITIVE EMISSIONS.

Emission unit U00085 is associated with the following emission points (EP):
059K0, 059K1, 059K2, 059K3, 059K4, 059K5

Process: S15 is located at Building 59, Building 059 - R&D COATING OF PLASTIC/ PAPER (EXEMPT FROM THE REQUIREMENTS OF PART 228-1).

Process: S21 is located at Building 059 - COMMERCIAL COATING OF PLASTIC / PAPER USING PART 228-1 COMPLIANT COATINGS

Process: S23 is located at Building 059 - GENERAL PROCESS EMISSION SOURCES (E.G. CHEMICAL WEIGHING, MELTING & SOLUTION DELIVERY).

Process: S29 is located at Building 059 - COMMERCIAL COATING OF PLASTIC/PAPER, UTILIZING LOW VOLUME EXEMPTION 6 NYCRR PART 228-1.1(E)(13). EXEMPT FROM 6 NYCRR PART 212 PER 6 NYCRR 212.7(l)

Emission unit U00053 - BUILDING 325 BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS, INCLUDING DRYING, SEPARATING, BLENDING, MATERIAL TRANSFER, AND STORAGE. SUBJECT TO MON MACT, AND INCLUDING ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00053 is associated with the following emission points (EP):
325B3, 325X3
Process: I35 is located at Building 325 - BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS SUBJECT TO BUILDING 325 VOC (VOLATILE ORGANIC COMPOUND) RACT (REASONABLY AVAILABLE CONTROL TECHNOLOGY) CAP.

Process: I47 is located at Building 325 - B-325 GLYCOL STORAGE TANKS WITH VOLATILE ORGANIC COMPOUND (VOC) EMISSION RATE POTENTIAL (ERP) LESS THAN 3 LBS PER HOUR (LB/HR)

Emission unit U00084 - BUILDING 59 & 308 BASE MANUFACTURING AND/OR WEB COATING OF PLASTIC/PAPER, AND RELATED SUPPORT OPERATIONS.

Emission unit U00084 is associated with the following emission points (EP):
059K6, 059K7, 08212, 308B5, 308B6, 308B7, 308B8, 308C2, 308C3
Process: G01 is located at AND 59, Building 308 - WEB FORMATION OR COATING OF PLASTIC/PAPER FOR R&D ONLY, EXEMPT FROM THE REQUIREMENTS OF 6 NYCRR PART 228-1. EMISSION SOURCES 308AA SUBJECT TO NSR RECORD KEEPING / CAP FOR VOCS.

Process: G02 is located at Building 308 - NATURAL GAS-FIRED DRYER SUBJECT TO PART 227.

Process: G05 is located at Building 308 - GENERAL PROCESS EMISSION SOURCES SUBJECT TO NSR RECORD KEEPING AND CAP FOR VOCS.

Process: G06 is located at AND 59, Building 308 -

Process: G07 is located at Building 308 -

Process: G08 is located at AND 59, Building 308 -

Process: G09 is located at Building 059 -

Process: G10 is located at Building 308 -

Emission unit U00016 - DISPERSION MANUFACTURING OPERATIONS INCLUDING SIZE REDUCTION AND SLURRY MANUFACTURING EQUIPMENT, AND ASSOCIATED FUGITIVE EMISSIONS SUBJECT TO MISCELLANEOUS COATINGS MACT (SUBPART HHHHH).

Emission unit U00016 is associated with the following emission points (EP):
082X7
Process: S13 is located at Building 082 - GENERAL SIZE REDUCTION AND DISPERSION OPERATIONS INCLUDING SOURCES < 3 LB/HR VOC ERP (PARTICULATE MILLING AND MIXING).

Emission unit U00060 - BUILDING 301, 303, 304 & 337 BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS INCLUDING DRYING, SEPARATING, BLENDING, MATERIAL TRANSFER AND STORAGE, WITH PROCESSES SUBJECT TO MON MACT, INCLUDING ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00060 is associated with the following emission points (EP):
30105, 301X2, 303A8, 303B1, 303X1, 303X2, 303X3, 30403, 304A0, 304B0, 304X1, 304X2, 337A2, 337A3, 337A4, 337A5
Process: I24 is located at Building 303 - BUILDING 303 BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATION

Process: I25 is located at Building 301 - BUILDING 301 CHEMICAL BLENDING OPERATIONS

Process: I26 is located at Building 303 - BUILDING 303 PILOT AREA, WITH FEDERALLY ENFORCEABLE VOC CAPS

Process: I27 is located at and 337, Building 304 - BUILDING 304 SYNTHETIC CHEMICAL SEPARATING AND BLENDING OPERATIONS

Process: I28 is located at Building 304 - BUILDING 304 BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS

Process: I45 is located at Building 304 - BUILDING 304 HARDENER MANUFACTURING OPERATIONS SUBJECT TO FEDERALLY ENFORCEABLE CAPS FOR VOCS AND PARTICULATES

Process: I49 is located at and B-303, Building 301 - BUILDING 301 AND 303 GLYCOL STORAGE TANKS

Process: I51 is located at Building 337 - BUILDING 337 POLYMER AND PRINTING FORMULATION MANUFACTURING OPERATIONS

Process: I52 is located at Building 337 - BUILDING 337 BATCH SMALL SCALE MISCELLANEOUS

COATING MANUFACTURING OPRATIONS SUBJECT TO 40 CFR 63 SUBPART HHHHH, WITH SOLID PARTICULATE EMISSIONS.

Emission unit U00047 - B38 WEB COATING OPERATIONS, AND MISCELLANEOUS B-38 FILM MANUFACTURING OPERATIONS (INCLUDING EMULSION FINISHING, MAINTENANCE, AND STORAGE) WITH INCIDENTAL INDOOR FUGITIVE EMISSIONS.

Emission unit U00047 is associated with the following emission points (EP):
03802, 03810, 03812, 03813, 03815, 03816, 03817, 03818
Process: P61 is located at Building 038 - PLASTIC/PAPER WEB COATING USING PART 228-1 COMPLIANT COATING SYSTEM

Process: P65 is located at Building 038 - GENERAL PROCESS EMISSION SOURCES WITH NO PARTICULATE EMISSIONS

Emission unit U00087 - B349 TONER MANUFACTURING OPERATIONS; INCLUDING PULVERIZING, OXIDIZING & CLASSIFYING; AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00087 is associated with the following emission points (EP):
349A5, 349B5, 349B6, 349B7, 349B8, 349C2, 349C3, 349C8, 349C9, 349D0, 349D2, 349D3, 349D4, 349D5, 349D6, 349D7, 349E0, 349E2, 349E3, 349E4, 349E5, 349E6, 349E7, 349E8, 349E9, 349F0, 349F1, 349F2, 349F3, 349F5, 349F6, 349F7, 349F8, 349F9, 349G1, 349G3, 349G4, 349G5, 349H1, 349H2, 349H3, 349H4, 349H9, 349J2, 349J3, 349J4, 349J5, 349J6
Process: N10 TONER MANUFACTURING GENERAL PROCESS EMISSION SOURCES WITH VOC AND/OR NOX EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LBS/HR.

Process: N40 is located at Building 349 - ROOM 113 SOLVENT RECYCLE AND STORAGE TANK(S)

Process: N41 is located at Building 349 - ROOM 113 TONER MANUFACTURING OPERATIONS WITH VOC EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LB/HR

Process: N42 is located at Building 349 - ROOM 116/132/137 TONER MANUFACTURING OPERATIONS WITH VOC EMISSIONS LESS THAN RACT THRESHOLD OF 3.0 LB/HR

Process: N43 is located at Building 349 - ROOM 116/132/137 TONER MANUFACTURING OPERATIONS - SOLVENT AND WASTE STORAGE TANK(S)

Process: N44 is located at Building 349 - ROOM 116/132/137 TONER MANUFACTURING OPERATIONS WITH VOC EMISSION LESS THAN 3.0 LB/HR AND PARTICULATE EMISSIONS

Emission unit U00024 - POLYESTER FILM BASE MANUFACTURING OPERATIONS INCLUDING HEAT TRANSFER, EXTRUSION, COATING, DRYING, STORAGE AND MATERIAL HANDLING, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00024 is associated with the following emission points (EP):
31705, 31707, 31709, 317E7, 317F0, 317F4, 317F6, 317F8, 317G1, 317G3, 317G5, 317I1, 317I2, 317R3, 317R6, 317R7, 317S1, 317S3, 317S4, 317T5, 317T9, 317V9, 317W1, 317W2, 317W3, 317W4, 317W5, 317X1, 317X3, 317X5, 317X7, 317Y3, 317Y5, 317Y7, 317Y9, 317Z0, 317Z2, 317Z3, 317Z4, 317Z5, 317Z6, 317Z8, 317Z9, 33501, 33502, 351C8, 351D0
Process: E52 is located at Building 317 - FILM BASE MANUFACTURING PROCESS EMISSIONS WHICH ARE SUBJECT TO PART 212 ONLY.

Process: E53 is located at Building 317 - GENERAL PROCESS EMISSION SOURCES WITHOUT PARTICULATE EMISSIONS (I.E. MIXING, CHEMICAL STORAGE & CLEANING)

Process: E55 is located at Building 317 - FILM BASE EXTRUDING AND COATING OPERATIONS USING PART 228-1 COMPLIANT COATINGS

Process: E56 is located at Building 317 - RESEARCH AND DEVELOPMENT EXTRUSION AND SURFACE COATING OPERATIONS EXEMPT FROM 6NYCRR PART 228-1.

Process: E63 is located at Building 351 - VOC EMISSION SOURCES WITH ERP <3 LB/HR ASSOCIATED WITH HEAT TRANSFER OPERATIONS, INCLUDING THERMINOL TANKS, HOT OIL HEATER (OPERATED AS A COMBUSTION SOURCE), AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00032 - FINISHING OPERATIONS INCLUDING PERFORATING, SLITTING, SPOOLING, LABELING AND PACKAGING OPERATIONS WITH INCIDENTAL FUGITIVE EMISSIONS

Emission unit U00032 is associated with the following emission points (EP):
326B2, 326B7, 326C1, 326C2, 326C3, 326C4
Process: P93 is located at Building 326 - GENERAL PROCESS EMISSION SOURCES WITH PARTICULATE EMISSIONS (NOT REQUIRING CONTROL)

Process: P97 is located at Building 326 -

Emission unit U00009 - DISTILLING WEST MANUFACTURING OPERATIONS, INCLUDING DISTILLATION EQUIPMENT, STORAGE TANKS, MISCELLANEOUS ORGANIC CHEMICAL MANUFACTURING EQUIPMENT SUBJECT TO MON MACT, EQUIPMENT IN ORGANIC LIQUID DISTRIBUTION SERVICE SUBJECT TO OLD MACT, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00009 is associated with the following emission points (EP):
322B1
Process: H12 is located at Building 322 - DISTILLING WEST OPERATIONS WITH EMISSION CONTROLS TO MEET MACT, RACT AND/OR BACT REQUIREMENTS, INCLUDING STORAGE TANKS AND DISTILLATION PROCESSES.

Emission unit U00056 - BUILDING 304 BATCH SYNTHETIC CHEMICAL MANUFACTURING OPERATIONS, INCLUDING STORAGE TANKS, SUBJECT TO MON MACT AND NOT SUBJECT

TO NORTH CHEMICALS DEPARTMENT VOC RACT (VOLATILE ORGANIC COMPOUND REASONABLY AVAILABLE CONTROL TECHNOLOGY) CAP, INCLUDING ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00056 is associated with the following emission points (EP):
304A7, 304A8, 304A9
Process: I31 is located at Building 304 - WASTE WATER (TRAP TANK) VENTILATION

Process: I33 is located at Building 304 - BLDG 304, BAY-13 OPERATIONS SUBJECT TO PROCESS-SPECIFIC VOC RACT CAP

Process: I48 is located at Building 304 - B-304 GLYCOL STORAGE TANKS

Emission unit U00021 - DISTILLING EAST RECOVERY OPERATIONS INCLUDING DISTILLATION, STEAMING, STORAGE, PRODUCT TRANSFER AND DRUM FILLING, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00021 is associated with the following emission points (EP):
11601, 12007, 120A5, 120A9, 14201
Process: H80 is located at 115,116,142, D63, Building 120 - DISTILLING EAST OPERATIONS ASSOCIATED WITH PROCESSING SOLVENT GENERATED BY FILM MANUFACTURING ON-SITE AT EASTMAN BUSINESS PARK.

Process: H81 is located at 142, 115, 116, Building 120 -

Process: H82 is located at Building 120 -

Emission unit U00023 - SPID, MATERIALS HANDLING, MILLING AND MIXING OPERATIONS, AND ASSOCIATED FUGITIVE EMISSIONS.

Emission unit U00023 is associated with the following emission points (EP):
08229, 103A6, 11201, 112A1
Process: H06 is located at Building 112 - PARTICLE MILLING - RAW MATERIALS HANDLING, MILLING, AND MIXING OPERATIONS

Process: H07 is located at Building 103 - RAW MATERIAL HANDLING AND MIXING OPERATIONS WITH VOLATILE ORGANIC COMPOUND (VOC) EMISSION RATE POTENTIAL LESS THAN 3 POUNDS PER HOUR (LBS/HR) AND SUBJECT TO MON MACT.

Emission unit FAC004 - FACILITY EMISSION UNIT FOR USE OF ADHESIVES, SEALANTS, ADHESIVE PRIMERS & SEALANT PRIMERS

Process: AD1 is located at Building FACILITY - MISCELLANEOUS OPERATIONS LOCATED THROUGHOUT EASTMAN BUSINESS PARK USING ADHESIVES, SEALANTS, ADHESIVE

PRIMERS & SEALANT PRIMERS, SUBJECT TO PART 228-2

Process: AD2 is located at Building FACILITY - MISCELLANEOUS OPERATIONS LOCATED THROUGHOUT EASTMAN BUSINESS PARK USING ADHESIVES, SEALANTS, ADHESIVE PRIMERS & SEALANT PRIMERS, WITH FACILITY EMISSIONS ELIGIBLE FOR LOW-USE EXEMPTION

Process: AD3 is located at Building FACILITY - MISCELLANEOUS OPERATIONS LOCATED THROUGHOUT EASTMAN BUSINESS PARK USING ADHESIVES, SEALANTS, ADHESIVE PRIMERS & SEALANT PRIMERS, FOR RESEARCH AND DEVELOPMENT

Emission unit FAC001 - FACILITY EMISSION UNIT FOR SOLVENT METAL PARTS CLEANERS AND ASSOCIATED FUGITIVE EMISSIONS.

Process: 226 is located at Building FACILITY - SOLVENT METAL CLEANING MACHINES OPERATED BY KODAK LOCATED THROUGHOUT EASTMAN BUSINESS PARK WITH 6 NYCRR PART 226 APPLICABILITY WHICH WOULD OTHERWISE BE EXEMPT OR TRIVIAL CONSISTENT WITH PART 201-3.

Emission unit FAC003 - FACILITY EMISSION UNIT FOR EMERGENCY STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES (RICE) SUBJECT TO SUBPART ZZZZ RICE RULE. NO PART 225 (SULFUR IN FUEL) APPLICABLITY BASED ON THE ENGINES SIZE AND FUEL TYPE.

Process: SIL is located at Building FACILITY - SPARK IGNITION ENGINES LOCATED THROUGHOUT EASTMAN BUSINESS PARK LESS THAN OR EQUAL TO 500 BRAKE HORSEPOWER WHICH COMMENCED CONSTRUCTION OR RECONSTRUCTION BEFORE JUNE 12, 2006.

Title V/Major Source Status
EASTMAN BUSINESS PARK is subject to Title V requirements. This determination is based on the following information:
Kodak Park is a major facility because uncapped potential emissions for most USEPA criteria pollutants is over 250 tons per year (tpy) each and the potential emissions of many individual Hazardous Air Pollutants (HAPS) is over 10 tpy and and over 25 tpy for total HAPS.

Program Applicability
The following chart summarizes the applicability of EASTMAN BUSINESS PARK with regards to the principal air pollution
regulatory programs:

Regulatory Program	Applicability

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

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229,

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

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status
Facility is in compliance with all requirements.

SIC Codes
SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3861	PHOTOGRAPH EQUIPMENT & SUPPLIES

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

SCC Code	Description
1-02-004-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL <10MMBTU/HR **
1-02-006-03	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Less Than 10 MMBtu/Hr
2-01-001-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Reciprocating
2-01-002-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS Reciprocating
3-01-018-63	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION

	Extruder
3-01-820-02	CHEMICAL MANUFACTURING
	CHEMICAL MANUFACTURING - WASTEWATER
	AGGREGATE
	WASTEWATER TREATMENT
3-13-065-99	ELECTRICAL EQUIPMENT
	ELECTRICAL EQUIPMENT - SEMICONDUCTOR
	MANUFACTURING
	SEMICONDUCTOR MFG-MISCELLANEOUS OPERATIONS-
	GENERAL-SPECIFY MATERIAL
3-15-010-02	PHOTOGRAPHIC EQUIPMENT
	PHOTOCOPYING EQUIPMENT MANUFACTURING
	Toner Classification
3-16-030-01	PHOTOGRAPHIC PRODUCT MANUFACTURING
	MANUFACTURING
	EXTRUSION OPERATIONS
3-16-030-02	PHOTOGRAPHIC PRODUCT MANUFACTURING
	MANUFACTURING
	FILM SUPPORT OPERATIONS
3-16-040-01	PHOTOGRAPHIC PRODUCT MANUFACTURING
	CHEMICAL MANUFACTURING
	CHEMICAL MANUFACTURING
3-16-040-02	PHOTOGRAPHIC PRODUCT MANUFACTURING
	CHEMICAL MANUFACTURING
	ELMUSION MAKING OPERATION
3-16-040-03	PHOTOGRAPHIC PRODUCT MANUFACTURING
	CHEMICAL MANUFACTURING
	CHEMICAL MIXING OPERATIONS
3-16-050-01	PHOTOGRAPHIC PRODUCT MANUFACTURING
	SURFACE TREATMENTS
	SURFACE COATING OPERATIONS
3-16-050-02	PHOTOGRAPHIC PRODUCT MANUFACTURING
	SURFACE TREATMENTS
	GRID IONZERS
3-16-050-03	PHOTOGRAPHIC PRODUCT MANUFACTURING
	SURFACE TREATMENTS
	CORONA DISCHARGE TREATMENT
3-16-050-04	PHOTOGRAPHIC PRODUCT MANUFACTURING
	SURFACE TREATMENTS
	PHOTOGRAPHIC DRYING OPERATIONS`
3-16-060-01	PHOTOGRAPHIC PRODUCT MANUFACTURING
	FINISHING OPERATIONS
	GENERAL FILM MANUFACTURING
3-16-120-01	PHOTOGRAPHIC PRODUCT MANUFACTURING
	CLEANING OPERATIONS
	TANK CLEANING OPERATIONS
3-16-120-02	PHOTOGRAPHIC PRODUCT MANUFACTURING
	CLEANING OPERATIONS
	GENERAL CLEANING OPERATIONS
3-16-120-03	PHOTOGRAPHIC PRODUCT MANUFACTURING
	CLEANING OPERATIONS
	PARTS CLEANING OPERATION
3-16-130-01	PHOTOGRAPHIC PRODUCT MANUFACTURING
	STORAGE OPERATIONS
	SOLVENT STORAGE OPERATIONS
3-16-130-02	PHOTOGRAPHIC PRODUCT MANUFACTURING
	STORAGE OPERATIONS
	GENERAL STORAGE OPERATIONS
3-16-150-03	PHOTOGRAPHIC PRODUCT MANUFACTURING
	RECOVERY OPERATIONS
	DISTILLATION OPERATIONS
3-16-160-01	PHOTOGRAPHIC PRODUCT MANUFACTURING
	OTHER OPERATIONS
	GENERAL VENTILATION - MANUFACTURING AREAS

3-16-160-02	PHOTOGRAPHIC PRODUCT MANUFACTURING OTHER OPERATIONS GENERAL PROCESS TANK OPERATIONS
3-16-160-03	PHOTOGRAPHIC PRODUCT MANUFACTURING OTHER OPERATIONS MISCELLANEOUS MANUFACTURING - OPERATIONS
3-16-160-06	PHOTOGRAPHIC PRODUCT MANUFACTURING OTHER OPERATIONS CHEMICAL WEIGHING OPERATIONS
4-01-003-36	ORGANIC SOLVENT EVAPORATION COLD SOLVENT CLEANING/STRIPPING Entire Unit
4-05-003-01	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL PRINTING - FLEXOGRAPHIC
4-05-005-01	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Gravure - 2754
5-03-005-06	SOLID WASTE DISPOSAL - INDUSTRIAL SOLID WASTE DISPOSAL: INDUSTRIAL - INCINERATION Sludge

Facility Emissions Summary

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

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000092-52-4	1, 1 BIPHENYL				
000079-34-5	1,1,2,2-TETRACHLOROETHANE				
000057-14-7	1,1-DIMETHYL HYDRAZINE				
000120-82-1	1,2,4-TRICHLOROBENZENE				
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER				
000120-80-9	1,2-				

	BENZENEDIOL
000107-06-2	1,2-DICHLOROETHANE
000107-21-1	1,2-ETHANEDIOL
000108-38-3	1,3 DIMETHYL BENZENE
000095-80-7	1,3-BENZENEDIAMINE, 4-METHYL-
000106-99-0	1,3-BUTADIENE
000126-99-8	1,3-BUTADIENE, 2-CHLORO-
000497-26-7	1,3-DIOXOLANE,2-METHYL-C4H8O2
000085-44-9	1,3-ISOBENZOFURANDIONE
000123-31-9	1,4-BENZENEDIOL
000123-91-1	1,4-DIETHYLENE DIOXIDE
000063-25-2	1-NAPHTHALENOL, METHYLCARBAMATE
000098-86-2	1-PHENYLETHANONE
000542-75-6	1-PROPENE, 1,3-DICHLORO-
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN
000563-79-1	2,3-DIMETHYL-2-BUTENE
000121-14-2	2,4, DINITRO TOLUENE
000051-28-5	2,4, DINITROPHENOL
000088-06-2	2,4,6 TRICHLOROPHENOL
000094-75-7	2,4-DICHLOROPHENOXYACETIC ACID
000108-31-6	2,5 - FURANDIONE
000053-96-3	2-ACETYLAMINOFLUORENE
000078-59-1	2-CYCLOHEXEN-1-ONE,3,5,5-TRIMETHYL
000109-86-4	2-METHOXYETHANOL
000095-48-7	2-METHYL-PHENOL

000107-87-9	2-PENTANONE
000108-10-1	2-PENTANONE, 4-METHYL
000075-31-0	2-PROPANAMINE
000079-10-7	2-PROPENOIC ACID
000080-62-6	2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER
000141-32-2	2-PROPENOIC ACID, BUTYL ESTER
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER
000096-33-3	2-PROPENOIC ACID, METHYL ESTER
000091-94-1	3,3'-DICHLOROBENZIDINE
000119-90-4	3,3'-DIMETHOXYBENZIDINE
000107-05-1	3-CHLORO-1-PROPENE
000101-77-9	4,4'-DIAMINODIPHENYLMETHANE
000101-14-4	4,4-METHYLENE BIS(2-CHLOROANILINE)
0NY502-00-0	40 CFR 60-63 - TOTAL ORGANIC COMPOUNDS (TOC)
000060-11-7	4-DIMETHYLAMINOAZOBENZENE
000123-42-2	4-HYDROXY-4-METHYL-2-PENTANONE
000075-07-0	ACETALDEHYDE
000060-35-5	ACETAMIDE
000064-19-7	ACETIC ACID
000108-05-4	ACETIC ACID ETHENYL ESTER
000109-60-4	ACETIC ACID PROPYL ESTER
000079-11-8	ACETIC ACID, CHLORO
000079-20-9	ACETIC ACID, METHYL ESTER
000075-05-8	ACETONITRILE
000075-36-5	ACETYL CHLORIDE
000107-02-8	ACROLEIN
000532-27-4	ALPHA-CHLOROACETOPHENONE
007664-41-7	AMMONIA
000062-53-3	ANILINE

007440-36-0	ANTIMONY
007440-38-2	ARSENIC
000075-55-8	AZIRIDINE, 2-METHYL
007440-39-3	BARIUM
000090-04-0	BENZENAMINE, 2-METHOXY
000095-53-4	BENZENAMINE, 2-METHYL
000121-69-7	BENZENAMINE, N, N-DIMETHYL
000071-43-2	BENZENE
000098-82-8	BENZENE, (1-METHYLETHYL)
000072-55-9	BENZENE, 1,1'-(DICHLOROETHENYLIDENE)BIS[4-CHLORO-
000106-46-7	BENZENE, 1,4-DICHLORO-
000584-84-9	BENZENE, 2,4-DIISOCYANATO-1-METHYL-
001321-74-0	BENZENE, DIETHENYL-
000098-07-7	BENZENE, TRICHLOROMETHYL
000095-47-6	BENZENE,1,2-DIMETHYL
000100-44-7	BENZYL CHLORIDE
007440-41-7	BERYLLIUM
000057-57-8	BETA-PROPIOLACTONE
000117-81-7	BIS(2-ETHYLHEXYL) PHTHALATE
007726-95-6	BROMINE
000075-25-2	BROMOFORM
000109-74-0	BUTANENITRILE C4H7N
000105-45-3	BUTANOIC ACID,3-OXO-,METHYL ESTER
000071-36-3	BUTANOL
007440-43-9	CADMIUM
007440-70-2	CALCIUM
000133-06-2	CAPTAN
000051-79-6	CARBAMIC ACID, ETHY ESTER
000079-44-7	CARBAMIC CHLORIDE, DIMETHYL
000075-15-0	CARBON DISULFIDE
000630-08-0	CARBON MONOXIDE
000056-23-5	CARBON TETRACHLORIDE
000463-58-1	CARBONYL SULFIDE
000133-90-4	CHLORAMBEN

000057-74-9	CHLORDANE
007782-50-5	CHLORINE
000108-90-7	CHLOROBENZENE
000067-66-3	CHLOROFORM
007440-47-3	CHROMIUM
018540-29-9	CHROMIUM(VI)
007440-48-4	COBALT
007440-50-8	COPPER
001319-77-3	CRESYLIC ACID
000156-62-7	CYANAMIDE, CALCIUM SALT (1:1)
000057-12-5	CYANIDE
000110-82-7	CYCLOHEXANE
000334-88-3	DIAZOMETHANE
000132-64-9	DIBENZOFURAN
000075-09-2	DICHLOROMETHANE
000096-22-0	DIETHYL KETONE
000131-11-3	DIMETHYL PHTHALATE
000067-64-1	DIMETHYL KETONE
000067-68-5	DIMETHYL SULFOXIDE
000646-06-0	DIOXACYCLOPENTANE, 1,3-
000075-04-7	ETHANAMINE
000109-89-7	ETHANAMINE, N-ETHYL
000071-55-6	ETHANE, 1,1,1-TRICHLORO
000079-00-5	ETHANE, 1,1,2-TRICHLORO
000075-34-3	ETHANE, 1,1-DICHLORO-
000111-44-4	ETHANE, 1,1'-OXYBIS 2-CHLORO
000106-93-4	ETHANE, 1,2-DIBROMO
000075-00-3	ETHANE, CHLORO
025154-53-4	ETHANE, DIMETHOXY
000067-72-1	ETHANE, HEXACHLORO
000540-67-0	ETHANE, METHOXY-
000111-42-2	ETHANOL, 2,2'-IMINOBIS-
000075-35-4	ETHENE,1,1-DICHLORO
000510-15-6	ETHYL 4,4'-DICHLOROBENZILATE
000141-78-6	ETHYL ACETATE
000064-17-5	ETHYL ALCOHOL (ETHANOL)
000106-88-7	ETHYL OXIRANE
000100-41-4	ETHYLBENZENE

000079-06-1	ETHYLENE CARBOXAMIDE
000075-21-8	ETHYLENE OXIDE
000096-45-7	ETHYLENE THIOUREA
000151-56-4	ETHYLENEIMINE
016984-48-8	FLUORIDE
000050-00-0	FORMALDEHYDE
000068-12-2	FORMAMIDE, N,N-DIMETHYL
008006-61-9	GASOLINE
000076-44-8	HEPTACHLOR
000118-74-1	HEXACHLOROBENZENE
000087-68-3	HEXACHLOROBUTADIENE
000077-47-4	HEXACHLOROCYCLOPENTADIENE
000110-54-3	HEXANE
000822-06-0	HEXANE, 1,6-DIISOCYANATO-
000302-01-2	HYDRAZINE
010035-10-6	HYDROGEN BROMIDE
007647-01-0	HYDROGEN CHLORIDE
007664-39-3	HYDROGEN FLUORIDE
007783-06-4	HYDROGEN SULFIDE
007553-56-2	IODINE
000078-83-1	ISOBUTYL ALCOHOL
000078-84-2	ISOBUTYRIC ALDEHYDE
000108-21-4	ISOPROPYL ACETATE
000067-63-0	ISOPROPYL ALCOHOL
000108-20-3	ISOPROPYL ETHER
007439-92-1	LEAD
000058-89-9	LINDANE, GAMMA
007439-96-5	MANGANESE
007439-97-6	MERCURY
000062-75-9	METHANAMINE, N-METHYL-N-NITROSO
000074-82-8	METHANE
000542-88-1	METHANE, OXYBIS (CHLORO)
000072-43-5	METHOXYCHLOR
000067-56-1	METHYL ALCOHOL
000074-89-5	METHYL AMINE
000074-83-9	METHYL BROMIDE
000074-87-3	METHYL CHLORIDE

000107-30-2	METHYL CHLOROMETHYL ETHER
000078-93-3	METHYL ETHYL KETONE
000060-34-4	METHYL HYDRAZINE
000074-88-4	METHYL IODIDE
000624-83-9	METHYL ISOCYANATE
001634-04-4	METHYL TERTBUTYL ETHER
000101-68-8	METHYLENE BISPHENYL ISOCYANATE
000121-44-8	N,N-DIETHYL ETHANAMINE
000091-20-3	NAPHTHALENE
000544-16-1	N-BUTYL NITRATE
000142-82-5	N-HEPTANE
0NY059-28-0	NICKEL (NI 059)
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS
007697-37-2	NITRIC ACID
000098-95-3	NITROBENZENE
000059-89-2	NITROSOMORPHOLINE
000684-93-5	NITROSO-N-METHYLUREA
000119-93-7	O-TOLIDINE
0NY210-00-0	OXIDES OF NITROGEN
000106-89-8	OXIRANE, (CHLOROMETHYL)
000092-67-1	P-AMINODIPHENYL
000100-02-7	PARA-NITROPHENOL
0NY075-00-0	PARTICULATES
000082-68-8	PENTACHLORONITROBENZENE
000540-84-1	PENTANE, 2,2,4-TRIMETHYL-
000127-18-4	PERCHLOROETHYLENE
000108-95-2	PHENOL
000534-52-1	PHENOL, 2-METHYL-4,6-DINITRO
000108-39-4	PHENOL, 3-METHYL
000106-44-5	PHENOL, 4-METHYL
000087-86-5	PHENOL, PENTACHLORO
000075-44-5	PHOSGENE
007803-51-2	PHOSPHINE
000062-73-7	PHOSPHORIC

	ACID, 2,2-DICHLOROETHENYL DIMETHYL ESTER
000680-31-9	PHOSPHORIC TRIAMIDE, HEXAMETHYL
000056-38-2	PHOSPHOROTHIOIC ACID, O,O-DIETHYL O-(4-NITROPHENYL) ESTER
007723-14-0	PHOSPHORUS (YELLOW)
010025-87-3	PHOSPHORUS OXYCHLORIDE
0NY075-00-5	PM-10
001336-36-3	POLYCHLORINATED BIPHENYL
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS
007440-09-7	POTASSIUM K
000106-50-3	P-PHENYLENEDIAMINE
001120-71-4	PROPANE SULTONE
000096-12-8	PROPANE, 1,2-DIBROMO-3-CHLORO
000078-87-5	PROPANE, 1,2-DICHLORO
000075-56-9	PROPANE, 1,2-EPOXY-
000079-46-9	PROPANE, 2-NITRO
000071-23-8	PROPANOL
000107-13-1	PROPENENITRILE
000123-38-6	PROPIONALDEHYDE
000114-26-1	PROPOXUR
000110-86-1	PYRIDINE
000091-22-5	QUINOLINE
000106-51-4	QUINONE
0NY220-86-0	RADON (RN 220)
007782-49-2	SELENIUM
007440-23-5	SODIUM
000100-42-5	STYRENE
000096-09-3	STYRENE OXIDE
007704-34-9	SULFUR
007446-09-5	SULFUR DIOXIDE
007664-93-9	SULFURIC ACID
000064-67-5	SULFURIC ACID, DIETHYL ESTER
000077-78-1	SULFURIC ACID, DIMETHYL ESTER
007791-25-5	SULFURYL CHLORIDE
000109-99-9	TETRAHYDROFURAN

007719-09-7	THIONYL CHLORIDE
007550-45-0	TITANIUM TETRACHLORIDE
000108-88-3	TOLUENE
0NY100-00-0	TOTAL HAP
008001-35-2	TOXAPHENE
000079-01-6	TRICHLOROETHYLENE
000095-95-4	TRICHLOROPHENOL, 2,4,5
001582-09-8	TRIFLURALIN
000593-60-2	VINYL BROMIDE
000075-01-4	VINYL CHLORIDE
0NY998-00-0	VOC
001330-20-7	XYLENE, M, O & P MIXT.
000106-42-3	XYLENE, PARA-
007440-66-6	ZINC

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

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

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)

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

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

Regulatory Analysis

Location	Regulation	Condition	Short Description
Facility/EU/EP/Process/ES			

FACILITY	ECL 19-0301	598, 599	Powers and Duties of the Department with respect to air pollution control
U-00024	40CFR 60-A	308	General provisions
U-00024/-/E63/351AP	40CFR 60-Dc.48c(g)	324	Reporting and Recordkeeping Requirements.
U-00024/-/E63/351AP	40CFR 60-Dc.48c(i)	325	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 61-FF.342(a)	43	Benzene Emissions from Benzene waste operations - standards: general
FACILITY	40CFR 61-FF.356(a)	44	Benzene Emissions from Benzene waste operations - recordkeeping requirements
FACILITY	40CFR 61-FF.356(b)(1)	45	Benzene Emissions from Benzene waste operations - recordkeeping requirements
FACILITY	40CFR 61-FF.357(a)	46	Benzene Emissions from Benzene waste operations - reporting reqts
FACILITY	40CFR 61-FF.357(b)	47	Benzene Emissions from Benzene waste operations - reporting reqts
FACILITY	40CFR 61-M	42	Asbestos standards for: asbestos mills, manufacturing operations using asbestos, and other sources
U-00021	40CFR 63-EEEE.2342(b)	245	Compliance dates for existing affected sources
U-00021	40CFR 63-EEEE.2343	1 -38	Requirements for emission sources not requiring control
U-00021/14201/H80	40CFR 63-EEEE.2346(a)	1 -53	Emission limitations, operating limits, and work practice standards
U-00021	40CFR 63-EEEE.2346(c)	247	Compliance requirements for equipment leaks
U-00021	40CFR 63-EEEE.2378	249	Requirements for demonstrating continuous compliance with emission limits, operating limits and work practice standards
U-00021	40CFR 63-EEEE.2386	1 -39	Reporting requirements
U-00021	40CFR 63-EEEE.2390	250	Records that must be maintained
U-00021	40CFR 63-EEEE.2398	1 -40	General provisions

U-00009	40CFR 63-FFFF	166, 167, 168	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
U-00021/12007/H81	40CFR 63-FFFF	1 -50	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
U-00021/14201/H81	40CFR 63-FFFF	1 -54	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
U-00009	40CFR 63-FFFF.2435(d)	169	Miscellaneous Organic Chemical Mfg NESHAP - transfer rack loading arm or storage tank requirements.
U-00021/-/H81	40CFR 63-FFFF.2435(d)	252	Miscellaneous Organic Chemical Mfg NESHAP - transfer rack loading arm or storage tank requirements.
U-00009	40CFR 63-FFFF.2450(e)	170, 171, 172, 173, 175, 1 -32	Miscellaneous Organic Chemical Mfg NESHAP - General requirements for control devices.
U-00021/-/H81	40CFR 63-FFFF.2450(e)	257, 1 -41, 1 -42, 1 -43, 1 -44, 1 -45	Miscellaneous Organic Chemical Mfg NESHAP - General requirements for control devices.
U-00053	40CFR 63-FFFF.2450(e)	406	Miscellaneous Organic Chemical Mfg NESHAP - General requirements for control devices.
U-00053/325X3/I35/325AP	40CFR 63-FFFF.2450(e)	435, 436, 1 -80	Miscellaneous Organic Chemical Mfg NESHAP - General requirements for control devices.
U-00060	40CFR 63-FFFF.2450(e)	469, 470, 471, 1 -88	Miscellaneous Organic Chemical Mfg NESHAP - General requirements for control devices.
U-00053/-/I35	40CFR 63-FFFF.2450(k)(3	422	Miscellaneous Organic Chemical Mfg NESHAP - alternate monitoring using caustic strength of the effluent.
U-00060	40CFR 63-FFFF.2450(k)(3	473	Miscellaneous Organic Chemical Mfg NESHAP - alternate monitoring using caustic strength of the effluent.
U-00021/-/H81	40CFR 63-FFFF.2455(b)	259	Miscellaneous Organic

U-00021/-/H81	40CFR 63-FFFF.2460(b)	1 -46	Chemical Manufacturing NESHAP (MON) - Continuous Process Vents - Group 1 or TRE calculations Miscellaneous Organic
U-00025	40CFR 63-FFFF.2460(b)	338	Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status Miscellaneous Organic
U-00053/-/I35	40CFR 63-FFFF.2460(b)	423	Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status Miscellaneous Organic
U-00060	40CFR 63-FFFF.2460(b)	474	Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status Miscellaneous Organic
U-00060/304B0	40CFR 63-FFFF.2465(a)	515, 517, 1 -96	Chemical Manufacturing NESHAP (MON) - Process Vents Emitting Halogens or PM - emission limits Miscellaneous Organic
U-00060/304X1	40CFR 63-FFFF.2465(a)	524, 525, 1 -97	Chemical Manufacturing NESHAP (MON) - Process Vents Emitting Halogens or PM - emission limits Miscellaneous Organic
U-00025	40CFR 63-FFFF.2465(b)	339	Chemical Manufacturing NESHAP (MON) - uncontrolled hydrogen halide & halogen HAP emissions. Miscellaneous Organic
U-00053/-/I35	40CFR 63-FFFF.2465(b)	424	Chemical Manufacturing NESHAP (MON) - uncontrolled hydrogen halide & halogen HAP emissions. Miscellaneous Organic
U-00060	40CFR 63-FFFF.2465(b)	475	Chemical Manufacturing NESHAP (MON) - uncontrolled hydrogen halide & halogen HAP emissions. Miscellaneous Organic
U-00053/325X3/I35/325AP	40CFR 63-FFFF.2465(c)(1	439, 1 -81, 1 -82	Chemical Manufacturing NESHAP (MON) - Design evaluation for process vents. Miscellaneous Organic

U-00060/303X1	40CFR 63-FFFF.2465(c)(1	1 -93, 1 -94, 1 -95	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Design evaluation for process vents.
U-00021/-/H81	40CFR 63-FFFF.2470(a)	261	Miscellaneous Organic Chemical Mfg NESHAP - Storage Tank Provisions
U-00009	40CFR 63-FFFF.2470(d)	176	Miscellaneous Organic Chemical Mfg NESHAP - Storage Tanks - Planned Routine Maintenance
U-00021/-/H81	40CFR 63-FFFF.2470(d)	262	Miscellaneous Organic Chemical Mfg NESHAP - Storage Tanks - Planned Routine Maintenance
U-00021/-/H81	40CFR 63-FFFF.2475	263	Misc. Organic Chemical NESHAP
U-00009	40CFR 63-FFFF.2480	177, 178, 179, 180, 181, 182, 183, 184, 185, 186	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
U-00021/-/H81	40CFR 63-FFFF.2480	264, 265, 266, 267, 268, 269, 270, 271, 272	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
U-00023/-/H07	40CFR 63-FFFF.2480	294, 295, 296, 297, 298	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
U-00025	40CFR 63-FFFF.2480	340, 341, 343, 344, 345, 346, 347, 348, 1 -68	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
U-00053	40CFR 63-FFFF.2480	408, 409, 410, 411, 412, 413, 414, 415, 1 -78	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
U-00056	40CFR 63-FFFF.2480	444, 445, 446, 447, 448, 449	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
U-00056/-/I33	40CFR 63-FFFF.2480	1 -84	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
U-00060	40CFR 63-FFFF.2480	476, 477, 479, 480, 481, 482, 483, 484, 1 -89	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
U-00009	40CFR 63-FFFF.2485	187, 188, 189, 190	Miscellaneous Organic Chemical

			Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00021/-/H81	40CFR 63-FFFF.2485	273, 274, 275, 276	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00023/-/H07	40CFR 63-FFFF.2485	299, 300	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00025	40CFR 63-FFFF.2485	349, 350, 351	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00053	40CFR 63-FFFF.2485	416, 417, 418	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00056	40CFR 63-FFFF.2485	450, 1 -83	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00056/-/I33	40CFR 63-FFFF.2485	456	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00060	40CFR 63-FFFF.2485	485, 486, 487, 488, 489	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
U-00009	40CFR 63-FFFF.2485(j)	191	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.
U-00021/-/H81	40CFR 63-FFFF.2485(j)	277	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.

U-00023/-/H07	40CFR 63-FFFF.2485(j)	301	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.
U-00025	40CFR 63-FFFF.2485(j)	353	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.
U-00053	40CFR 63-FFFF.2485(j)	419	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.
U-00060	40CFR 63-FFFF.2485(j)	490	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.
U-00089	40CFR 63-FFFF.2485(j)	594	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Wastewater streams requirements.
U-00009	40CFR 63-FFFF.2490	192, 193	Heat exchange system requirements
U-00021/-/H81	40CFR 63-FFFF.2490	278, 279	Heat exchange system requirements
U-00025	40CFR 63-FFFF.2490	354, 355	Heat exchange system requirements
U-00053/-/I35	40CFR 63-FFFF.2490	425, 426	Heat exchange system requirements
U-00056	40CFR 63-FFFF.2490	451, 452	Heat exchange system requirements
U-00060	40CFR 63-FFFF.2490	491, 492	Heat exchange system requirements
FACILITY	40CFR 63-FFFF.2520	1 -24	Miscellaneous Organic Chemical Mfg NESHAP - Reporting
U-00009	40CFR 63-FFFF.2525	194, 195, 196, 197	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00021/-/H81	40CFR 63-FFFF.2525	280, 281, 283, 284, 1 -47	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00023/-/H07	40CFR 63-FFFF.2525	302, 303, 304	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00025	40CFR 63-FFFF.2525	356, 357, 358, 359	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00053	40CFR 63-FFFF.2525	420	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping

			Requirements
U-00053/-/I35	40CFR 63-FFFF.2525	427, 428, 429	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00053/325X3/I35/325AP	40CFR 63-FFFF.2525	441	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00056	40CFR 63-FFFF.2525	453, 454	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00056/-/I33	40CFR 63-FFFF.2525	457, 458	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00060	40CFR 63-FFFF.2525	493, 494, 495, 496, 497	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00089	40CFR 63-FFFF.2525	595, 596, 597	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
U-00009/-/H12	40CFR 63-FFFF.2535(h)	199	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Compliance with other regulations
U-00009/-/H12	40CFR 63-FFFF.2535(k)	200	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Compliance with other regulations
FACILITY	40CFR 63-FFFF.2535(l)	1 -25	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Applicability of process units included in a process unit group
FACILITY	40CFR 63-FFFF.2540	1 -26	Miscellaneous Organic Chemical Mfg NESHAP - General Provisions
U-00060/-/I52	40CFR 63-HHHHH.8000(a)	1 -90	Miscellaneous Coating Mfg. NESHAP - General Requirements
U-00016	40CFR 63-HHHHH.8000(b)	233	Miscellaneous Organic Coating Mfg. NESHAP - General Requirements
U-00060/-/I52	40CFR 63-HHHHH.8015	1 -91	Miscellaneous Coating Mfg. NESHAP - Equipment Leaks
U-00060/-/I52	40CFR 63-HHHHH.8030	1 -92	Miscellaneous Coating Mfg. NESHAP - Heat

FACILITY	40CFR 63-HHHHH.8075(e)	1	-27	Exchanger Provisions Miscellaneous Coating Mfg. NESHAP - Compliance reports
FACILITY	40CFR 63-HHHHH.8095	1	-28	Miscellaneous Coating Mfg. NESHAP - General Provisions
FACILITY	40CFR 63-JJJJ.3340	61		Paper and Other Web Coating NESHAP - General Requirements
FACILITY	40CFR 63-JJJJ.3370(c)	1	-29	Paper and Other Web Coating NESHAP - Compliance demonstration for as-applied "compliant" coating materials
FACILITY	40CFR 63-JJJJ.3400(c)(2	1	-30	Paper and Other Web Coating NESHAP - Semiannual compliance report contents.
FACILITY	40CFR 63-JJJJ.3410(a)	1	-31	Paper and Other Web Coating NESHAP - Record keeping requirements.
U-00084	40CFR 63-KK.829(f)	1	-105	Printing and Publishing NESHAP- Recordkeeping
F-AC003/-/SIL	40CFR 63-ZZZZ.6602	84		Reciprocating Internal Combustion Engine (RICE) NESHAP - requirements for existing engines at major sources of HAP emissions
F-AC003/-/SIL	40CFR 63-ZZZZ.6625(e)	85		Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance of engine and control device
F-AC003/-/SIL	40CFR 63-ZZZZ.6625(f)	86		Reciprocating Internal Combustion Engine (RICE) NESHAP - non-resettable hour meter for certain existing emergency engines
F-AC003/-/SIL	40CFR 63-ZZZZ.6625(h)	87		Reciprocating Internal Combustion Engine (RICE) NESHAP - idling time at startup
F-AC003/-/SIL	40CFR 63-ZZZZ.6640(f)(1	88		Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency RICE operation
F-AC003/-/SIL	40CFR 63-ZZZZ.6655(f)	89		Reciprocating Internal Combustion Engine (RICE) NESHAP - Recordkeeping requirements
F-AC003	40CFR 63-ZZZZ.6665	73		Reciprocating Internal Combustion

			Engine (RICE) NESHAP - General provisions
U-00060/304B0/I45/30417	40CFR 64	522	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 64.7	65	CAM - Operation of approved monitoring
FACILITY	40CFR 64.8	66	CAM - Quality improvement plan (QIP) requirements
FACILITY	40CFR 64.9	67	CAM - Reporting and recordkeeping requirements
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.3	22	False Statement.
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	1 -133	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	1 -6	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	1 -7	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	1 -8	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 24, 68, 69	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	1 -9	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	1 -1	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	1 -10	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	1 -2	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	1 -3	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii	1 -4	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	1 -12	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	1 -5	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)	1 -13, 1 -14	Operational Flexibility
U-00021	6NYCRR 201-6.4(f)(1)	1 -36	Operational Flexibility -

				Alternate Operating Scenarios
U-00024	6NYCRR 201-6.4(f)(1)	1	-57	Operational Flexibility - Alternate Operating Scenarios
U-00084	6NYCRR 201-6.4(f)(1)	1	-103	Operational Flexibility - Alternate Operating Scenarios
U-00085	6NYCRR 201-6.4(f)(1)	1	-112	Operational Flexibility - Alternate Operating Scenarios
FACILITY	6NYCRR 201-6.4(f)(6)	1	-11	Off Permit Changes
FACILITY	6NYCRR 202-1.1	19		Required emissions tests.
FACILITY	6NYCRR 202-2.1	7		Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8		Emission Statements - record keeping requirements.
FACILITY	6NYCRR 207	28		Control Measures for an Air Pollution Episode
FACILITY	6NYCRR 211.1	29		General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	601		General Prohibitions - visible emissions limited.
U-00021/12007	6NYCRR 212.10(c)(4)(i)	1	-49	NOx and VOC RACT required at major facilities
U-00021/14201	6NYCRR 212.10(c)(4)(i)	1	-52	NOx and VOC RACT required at major facilities
U-00090/326C7	6NYCRR 212.10(c)(4)(i)	1	-132	NOx and VOC RACT required at major facilities
U-00012/030N1/P04/030AW	6NYCRR 212.10(c)(4)(iii	1	-33	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00021/11601	6NYCRR 212.10(c)(4)(iii	1	-48	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00021/120A5	6NYCRR 212.10(c)(4)(iii	1	-51	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00047/03810/P65/038AB	6NYCRR 212.10(c)(4)(iii	1	-75	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00047/03816/P65/038AG	6NYCRR 212.10(c)(4)(iii	1	-76	General Process Emission Sources - NOx and VOC RACT required at major

			facilities
U-00053/-/I35	6NYCRR 212.10(c)(4)(iii	1 -79	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00056/304A8	6NYCRR 212.10(c)(4)(iii	461	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00060	6NYCRR 212.10(c)(4)(iii	1 -87	General Process Emission Sources - NOx and VOC RACT required at major facilities
U-00084/308B7/G05	6NYCRR 212.10(c)(4)(iii	541	General Process Emission Sources - NOx and VOC RACT required at major facilities
FACILITY	6NYCRR 212.4(a)	602	General Process Emission Sources - emissions from new sources and/or modifications
U-00021/11601	6NYCRR 212.4(a)	1 -134	General Process Emission Sources - emissions from new sources and/or modifications
U-00021/12007	6NYCRR 212.4(a)	1 -135	General Process Emission Sources - emissions from new sources and/or modifications
U-00021/120A5	6NYCRR 212.4(a)	1 -136	General Process Emission Sources - emissions from new sources and/or modifications
U-00021/14201	6NYCRR 212.4(a)	1 -137	General Process Emission Sources - emissions from new sources and/or modifications
U-00047/03816/P65/038AG	6NYCRR 212.4(a)	1 -138	General Process Emission Sources - emissions from new sources and/or modifications
U-00053/325X3	6NYCRR 212.4(a)	643, 1 -139	General Process Emission Sources - emissions from new sources and/or modifications
U-00056/304A8	6NYCRR 212.4(a)	1 -140	General Process Emission Sources - emissions from new sources and/or modifications
U-00060	6NYCRR 212.4(a)	1 -141	General Process Emission Sources - emissions from new

			sources and/or modifications
U-00060/303A8	6NYCRR 212.4(a)	647	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/303B1	6NYCRR 212.4(a)	648	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/303X1	6NYCRR 212.4(a)	649	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/304B0	6NYCRR 212.4(a)	650	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/304B0/I45	6NYCRR 212.4(a)	651	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/304X1	6NYCRR 212.4(a)	652	General Process Emission Sources - emissions from new sources and/or modifications
U-00060/304X2	6NYCRR 212.4(a)	653	General Process Emission Sources - emissions from new sources and/or modifications
U-00084	6NYCRR 212.4(a)	1 -142	General Process Emission Sources - emissions from new sources and/or modifications
U-00084/308B5	6NYCRR 212.4(a)	1 -143	General Process Emission Sources - emissions from new sources and/or modifications
U-00090/326C7	6NYCRR 212.4(a)	1 -144	General Process Emission Sources - emissions from new sources and/or modifications
U-00012/-/P04	6NYCRR 212.4(c)	221	General Process Emission Sources - emissions from new processes and/or modifications
U-00012/03054/P03/030AC	6NYCRR 212.4(c)	224	General Process Emission Sources - emissions from new processes and/or modifications
U-00012/03055/P03/030AD	6NYCRR 212.4(c)	225	General Process Emission Sources -

				emissions from new processes and/or modifications
U-00012/03062/P03/030AH	6NYCRR 212.4(c)	226		General Process Emission Sources - emissions from new processes and/or modifications
U-00012/030L0/P03/030AM	6NYCRR 212.4(c)	227		General Process Emission Sources - emissions from new processes and/or modifications
U-00012/030L1/P03/030AN	6NYCRR 212.4(c)	228		General Process Emission Sources - emissions from new processes and/or modifications
U-00012/030L4/P03/030AQ	6NYCRR 212.4(c)	229		General Process Emission Sources - emissions from new processes and/or modifications
U-00012/030M9/P03/030AV	6NYCRR 212.4(c)	230		General Process Emission Sources - emissions from new processes and/or modifications
U-00016	6NYCRR 212.4(c)	1 -34		General Process Emission Sources - emissions from new processes and/or modifications
U-00023	6NYCRR 212.4(c)	1 -55		General Process Emission Sources - emissions from new processes and/or modifications
U-00023/112A1/H06/112AC	6NYCRR 212.4(c)	305		General Process Emission Sources - emissions from new processes and/or modifications
U-00024	6NYCRR 212.4(c)	1 -58		General Process Emission Sources - emissions from new processes and/or modifications
U-00024/-/E52	6NYCRR 212.4(c)	310, 1 -59, 1 -60, 1 -61		General Process Emission Sources - emissions from new processes and/or modifications
U-00024/317W3/E52/317DL	6NYCRR 212.4(c)	332		General Process Emission Sources - emissions from new processes and/or modifications
U-00025/-/S05	6NYCRR 212.4(c)	360		General Process Emission Sources - emissions from new processes and/or modifications
U-00032/-/P93	6NYCRR 212.4(c)	1 -69		General Process

U-00053	6NYCRR 212.4(c)	401	Emission Sources - emissions from new processes and/or modifications General Process
U-00053/325X3	6NYCRR 212.4(c)	434	Emission Sources - emissions from new processes and/or modifications General Process
U-00056/304A8/I33	6NYCRR 212.4(c)	463	Emission Sources - emissions from new processes and/or modifications General Process
U-00060	6NYCRR 212.4(c)	1 -85	Emission Sources - emissions from new processes and/or modifications General Process
U-00060/-/I24	6NYCRR 212.4(c)	498	Emission Sources - emissions from new processes and/or modifications General Process
U-00060/-/I25	6NYCRR 212.4(c)	499	Emission Sources - emissions from new processes and/or modifications General Process
U-00060/-/I27/304AA	6NYCRR 212.4(c)	500, 501	Emission Sources - emissions from new processes and/or modifications General Process
U-00060/-/I27/304AB	6NYCRR 212.4(c)	502, 503	Emission Sources - emissions from new processes and/or modifications General Process
U-00060/-/I28	6NYCRR 212.4(c)	504	Emission Sources - emissions from new processes and/or modifications General Process
U-00060/303A8/I26/303AE	6NYCRR 212.4(c)	509	Emission Sources - emissions from new processes and/or modifications General Process
U-00060/304B0/I45/30410	6NYCRR 212.4(c)	520	Emission Sources - emissions from new processes and/or modifications General Process
U-00060/304B0/I45/30411	6NYCRR 212.4(c)	521	Emission Sources - emissions from new processes and/or modifications General Process

U-00075/08224	6NYCRR 212.4(c)	527	General Process Emission Sources - emissions from new processes and/or modifications
U-00083/082X8/Y14/082BM	6NYCRR 212.4(c)	1 -101	General Process Emission Sources - emissions from new processes and/or modifications
U-00083/205C5/Y14/205CX	6NYCRR 212.4(c)	1 -102	General Process Emission Sources - emissions from new processes and/or modifications
U-00084	6NYCRR 212.4(c)	530	General Process Emission Sources - emissions from new processes and/or modifications
U-00085	6NYCRR 212.4(c)	1 -113	General Process Emission Sources - emissions from new processes and/or modifications
U-00087	6NYCRR 212.4(c)	1 -119	General Process Emission Sources - emissions from new processes and/or modifications
U-00087/-/N10	6NYCRR 212.4(c)	1 -121	General Process Emission Sources - emissions from new processes and/or modifications
U-00087/349D2/N10/349CA	6NYCRR 212.4(c)	590	General Process Emission Sources - emissions from new processes and/or modifications
U-00087/349E0/N10/349CK	6NYCRR 212.4(c)	591	General Process Emission Sources - emissions from new processes and/or modifications
U-00087/349H4/N44/349EG	6NYCRR 212.4(c)	592	General Process Emission Sources - emissions from new processes and/or modifications
U-00087/349H9/N44/349EL	6NYCRR 212.4(c)	593	General Process Emission Sources - emissions from new processes and/or modifications
U-00090	6NYCRR 212.4(c)	1 -124	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.5(d)	603	Applicable emission standards
FACILITY	6NYCRR 212.5(e)	30	Applicable emission standards

U-00012	6NYCRR 212.6(a)	220	General Process Emission Sources - opacity of emissions limited
U-00016/082X7	6NYCRR 212.6(a)	1 -35	General Process Emission Sources - opacity of emissions limited
U-00023	6NYCRR 212.6(a)	1 -56	General Process Emission Sources - opacity of emissions limited
U-00024/-/E52	6NYCRR 212.6(a)	312	General Process Emission Sources - opacity of emissions limited
U-00025/-/S05	6NYCRR 212.6(a)	361	General Process Emission Sources - opacity of emissions limited
U-00032/-/P93	6NYCRR 212.6(a)	1 -70	General Process Emission Sources - opacity of emissions limited
U-00053	6NYCRR 212.6(a)	402	General Process Emission Sources - opacity of emissions limited
U-00056/304A8/I33	6NYCRR 212.6(a)	464	General Process Emission Sources - opacity of emissions limited
U-00060	6NYCRR 212.6(a)	1 -86	General Process Emission Sources - opacity of emissions limited
U-00075/08224	6NYCRR 212.6(a)	528	General Process Emission Sources - opacity of emissions limited
U-00083	6NYCRR 212.6(a)	1 -98	General Process Emission Sources - opacity of emissions limited
U-00084	6NYCRR 212.6(a)	531	General Process Emission Sources - opacity of emissions limited
U-00085	6NYCRR 212.6(a)	1 -114	General Process Emission Sources - opacity of emissions limited
U-00087	6NYCRR 212.6(a)	1 -120	General Process Emission Sources - opacity of emissions limited
U-00089/082X6/S11	6NYCRR 212.6(a)	1 -122	General Process Emission Sources - opacity of emissions limited
U-00090	6NYCRR 212.6(a)	1 -125	General Process Emission Sources - opacity of emissions limited

FACILITY	6NYCRR 215.2	9		Open Fires - Prohibitions
F-AC001	6NYCRR 226	70		SOLVENT METAL CLEANING PROCESSES
F-AC003/-/SIL	6NYCRR 227-1.3(a)	83		Smoke Emission Limitations.
U-00024/351C8/E63/351AP	6NYCRR 227-1.3(a)	335		Smoke Emission Limitations.
U-00084/-/G02/308AB	6NYCRR 227-1.3(a)	538		Smoke Emission Limitations.
U-00024/-/E63/351AP	6NYCRR 227-2.4	1	-65	Control requirements.
U-00024/-/E63/351AP	6NYCRR 227-2.4(d)	1	-66	Small boilers, small combustion turbines, and small stationary internal combustion engines.
FACILITY	6NYCRR 228-1.1(a)(3)	1	-15	Once in always in
U-00024/-/E55	6NYCRR 228-1.3(a)	1	-62	Surface Coating General Requirements-Opacity
U-00047/-/P61	6NYCRR 228-1.3(a)	1	-71	Surface Coating General Requirements-Opacity
U-00084/-/G08	6NYCRR 228-1.3(a)	1	-106	Surface Coating General Requirements-Opacity
U-00084/-/G09	6NYCRR 228-1.3(a)	1	-108	Surface Coating General Requirements-Opacity
U-00084/-/G10	6NYCRR 228-1.3(a)	1	-109	Surface Coating General Requirements-Opacity
U-00085/-/S29	6NYCRR 228-1.3(a)	1	-117	Surface Coating General Requirements-Opacity
U-00085/059K4/S21/059AX	6NYCRR 228-1.3(a)	1	-118	Surface Coating General Requirements-Opacity
FACILITY	6NYCRR 228-1.3(c)	1	-16	Surface Coating General Requirements-Prohibitions
U-00024/-/E55	6NYCRR 228-1.3(d)	1	-63	Surface Coating General Requirements-Handling, storage and disposal
U-00047/-/P61	6NYCRR 228-1.3(d)	1	-72	Surface Coating General Requirements-Handling, storage and disposal
U-00084	6NYCRR 228-1.3(d)	1	-104	Surface Coating General Requirements-Handling, storage and disposal
U-00085	6NYCRR 228-1.3(d)	1	-115	Surface Coating General Requirements-Handling, storage and disposal
FACILITY	6NYCRR 228-1.3(e)(2)	1	-17	Use of 55 gallons of non-compliant coating
U-00024/-/E55	6NYCRR 228-1.4(d)(3)	1	-64	VOC limits for Paper Film & Foil coatings
U-00084/-/G08	6NYCRR 228-1.4(d)(3)	1	-107	VOC limits for Paper Film & Foil coatings
U-00085/-/S21	6NYCRR 228-1.4(d)(3)	1	-116	VOC limits for Paper

			Film & Foil coatings
U-00047/-/P61	6NYCRR 228-1.5(d)	1 -73, 1 -74	Coating system as a control strategy
U-00084/-/G10	6NYCRR 228-1.5(e)	1 -110	Process specific RACT demonstrations
FACILITY	6NYCRR 228-1.6(a)	1 -18	Surface coating VOC analysis.
FACILITY	6NYCRR 228-1.6(c)	1 -19	Surface coating access for sampling
FACILITY	6NYCRR 228-1.6(h)	1 -20	Records reporting and maintaining
F-AC004/-/AD1	6NYCRR 228-2.3(e)	606	Adhesives applied to substrates
F-AC004/-/AD1	6NYCRR 228-2.3(f)(1)	607	Surface preparation solvent
F-AC004/-/AD1	6NYCRR 228-2.3(f)(3)	608	Cleanup solvent
F-AC004/-/AD1	6NYCRR 228-2.3(f)(4)	609	Spray application equipment
F-AC004/-/AD1	6NYCRR 228-2.3(h)	610	Required VOC controls for Industrial adhesive processes emitting 3 tons per year or more.
F-AC004/-/AD1	6NYCRR 228-2.3(i)	611	No person shall solicit, require the use or specify the application of noncomplaint products.
F-AC004	6NYCRR 228-2.4	605	Exemptions and Exceptions
F-AC004/-/AD2	6NYCRR 228-2.4	614	Exemptions and Exceptions
F-AC004/-/AD1	6NYCRR 228-2.5(a)	612	Recordkeeping requirements for 228-2.4(a)
F-AC004/-/AD3	6NYCRR 228-2.5(d)	616	Laboratory Exemption Requirements
F-AC004/-/AD1	6NYCRR 228-2.7(b)	613	Container Labeling
F-AC004/-/AD2	6NYCRR 228-2.7(b)	615	Container Labeling
U-00012/-/P15	6NYCRR 229.3(e)(2)(v)	222	Volatile organic liquid storage tanks
U-00021	6NYCRR 229.3(e)(2)(v)	244	Volatile organic liquid storage tanks
U-00053/-/I47	6NYCRR 229.3(e)(2)(v)	431	Volatile organic liquid storage tanks
U-00056/-/I48	6NYCRR 229.3(e)(2)(v)	459	Volatile organic liquid storage tanks
U-00060/-/I49	6NYCRR 229.3(e)(2)(v)	505	Volatile organic liquid storage tanks
U-00087/-/N40/349DA	6NYCRR 229.3(e)(2)(v)	586	Volatile organic liquid storage tanks
U-00087/-/N43	6NYCRR 229.3(e)(2)(v)	588	Volatile organic liquid storage tanks
U-00090/-/Z03	6NYCRR 229.3(e)(2)(v)	1 -129	Volatile organic liquid storage tanks
U-00012/-/P15	6NYCRR 229.5(d)	223	Recordkeeping - VOL storage tanks
U-00021	6NYCRR 229.5(d)	1 -37	Recordkeeping - VOL storage tanks
U-00053/-/I47	6NYCRR 229.5(d)	432	Recordkeeping - VOL storage tanks
U-00056/-/I48	6NYCRR 229.5(d)	460	Recordkeeping - VOL storage tanks

U-00060/-/I49	6NYCRR 229.5(d)	506	Recordkeeping - VOL storage tanks
U-00087/-/N40/349DA	6NYCRR 229.5(d)	587	Recordkeeping - VOL storage tanks
U-00087/-/N43	6NYCRR 229.5(d)	589	Recordkeeping - VOL storage tanks
U-00090/-/Z03	6NYCRR 229.5(d)	1 -130	Recordkeeping - VOL storage tanks
FACILITY	6NYCRR 231-11.2(b)	40	Reasonable Possibility requirements for insignificant mods - less than 50% with excluded emissions
FACILITY	6NYCRR 231-11.2(c)	41	Reasonable Possibility requirements for insignificant mods - greater than 50% with excluded emissions
FACILITY	6NYCRR 231-2.12	1 -21, 1 -22, 1 -23	Table 2- Ozone nonattaiment area and transport region classification for volatile organic compounds and nitrogen oxides
U-00024/317X5	6NYCRR 231-2.2(d)(3)	333	Exemptions
U-00024/317X7	6NYCRR 231-2.2(d)(3)	1 -67	Exemptions
U-00047/03818	6NYCRR 231-2.2(d)(3)	373	Exemptions
U-00053/-/I35/325AT	6NYCRR 231-2.2(d)(3)	430	Exemptions
U-00056/304A8	6NYCRR 231-2.2(d)(3)	462	Exemptions
U-00060/303A8/I26	6NYCRR 231-2.2(d)(3)	508	Exemptions
U-00060/303X2/I26	6NYCRR 231-2.2(d)(3)	513	Exemptions
U-00060/30403/I27	6NYCRR 231-2.2(d)(3)	514	Exemptions
U-00060/304B0/I45	6NYCRR 231-2.2(d)(3)	518, 519	Exemptions
U-00084	6NYCRR 231-2.2(d)(3)	536	Exemptions
U-00084/08212	6NYCRR 231-2.2(d)(3)	1 -111	Exemptions
U-00025	6NYCRR 233.3	336	Control requirements.
U-00053	6NYCRR 233.3	403	Control requirements.
U-00056	6NYCRR 233.3	442	Control requirements.
U-00060	6NYCRR 233.3	466	Control requirements.
U-00025	6NYCRR 233.3(g)	337	Leak requirements
U-00053	6NYCRR 233.3(g)	404	Leak requirements
U-00056	6NYCRR 233.3(g)	443	Leak requirements
U-00060	6NYCRR 233.3(g)	467	Leak requirements
U-00053	6NYCRR 233.3(h)(1)	1 -77	Variances
U-00060	6NYCRR 233.3(h)(1)	468	Variances
U-00090/-/Z02	6NYCRR 234.5	1 -126	Prohibition of sale or specification
U-00090/-/Z02	6NYCRR 234.6	1 -127	Handling, storage and dispoal of VOCs
U-00090/-/Z02	6NYCRR 234.7	1 -128	Recordkeeping requirements
U-00090/326C6/Z02/326BN	6NYCRR 234.8	1 -131	Opacity
U-00009/-/H12	6NYCRR 236.2(c)	198	Applicability.

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

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the

Department with regard to administering the air pollution control program for New York State.

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

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

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

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (5)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2
This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, EASTMAN BUSINESS PARK has been determined to be subject to the following regulations:
40 CFR 60.48c (g)
The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

40 CFR 60.48c (i)
This regulation requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

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

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

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

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

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

40 CFR 63.2342 (b)
This citation of the Organic Liquid Distribution MACT rule (Subpart EEEE) states that if an addition or change other than reconstruction is made that causes the total actual annual facility-level organic liquid loading volume to exceed 800,000 gallons, Kodak must comply with the transfer rack requirements specified in §63.2346(b) immediately; that is, be in compliance the first day of the period following the end of the 3-year period triggering the control criteria.

40 CFR 63.2343
This regulation requires if an addition or change other than reconstruction is made that causes the total actual annual facility-level organic liquid loading volume to exceed 800,000 gallons, Kodak must comply with the transfer rack requirements specified in §63.2346(b) immediately; that is, be in compliance the first day of the period following the end of the 3-year period triggering the control criteria.

40 CFR 63.2346 (a)
This regulation sets the emission limits, ooperating limits and emission standards for storage tanks that are subject to 40 CFR 63 Subpart EEEE.

40 CFR 63.2346 (c)
This regulation requires that for each U-00021 pump, valve, and sampling connection subject to 40 CFR Part 63 Subpart EEEE that operates in organic liquids service for at least 300 hours per year, Kodak must comply with the applicable requirements under 40 CFR Part 63, Subpart TT (control level 1), Subpart UU (control level 2), or Subpart H. Pumps, valves, and sampling connectors that are insulated to provide protection against persistent sub-freezing temperatures are subject to the "difficult to monitor" provisions in the applicable Subpart selected by the owner or operator.

40 CFR 63.2378
This citation state the requirements for demonstrating continuous compliance with emission limits, operating limits, and work practice standards in Subpart EEEE Tables 2 through 4.

40 CFR 63.2386
This condition identifies the reporting requirements for organic liquid distribution operations subject to Subpart EEEE.

40 CFR 63.2390
This condition identifies the records that must be maintained organic liquid distribution operations subject to Subpart EEEE.

40 CFR 63.2398
This condition references the General Provisions applicable to organic liquid distribution operations subject to Subpart EEEE.

40 CFR 63.2435 (d)
This citation describes how to determine the applicability of a transfer rack loading arm or storage tank(s) under the Miscellaneous Organic Chemical Manufacturing MACT rule (Subpart FFFF).

40 CFR 63.2450 (e)
This citation references General Requirements for Closed Vent Systems subject to the Miscellaneous Organic Chemical Manufacturing rule (Subpart FFFF).

40 CFR 63.2450 (k) (3)
This citation references General Requirements for Continuous Parameter Monitoring Systems subject to the Miscellaneous Organic Chemical Manufacturing rule (Subpart FFFF) and provides for the alternative of measuring caustic strength of scrubber effluent rather than pH.

40 CFR 63.2455 (b)
2435(d)
This citation describes how to determine the applicability of a transfer rack loading arm or storage tank(s) under the Miscellaneous Organic Chemical Manufacturing (MON) rule (Subpart FFFF).
2450(e)
This citation describes the requirements for determining applicability under the MON rule for Continuous Process Vents.

40 CFR 63.2460 (b)
This citation describes the requirements for determining applicability ("Group status") under the MON rule for Batch Process Vents.

40 CFR 63.2465 (a)
This citation describes the MON requirements for Process Vents that emit hydrogen halide and halogen HAP or PM HAP.

40 CFR 63.2465 (b)
This citation describes the MON requirements for Process Vents that emit hydrogen halide and halogen HAP or PM HAP.

40 CFR 63.2465 (c) (1)
This citation references MON requirements for Process Vents with collective uncontrolled hydrogen halide and halogen HAP emissions greater than or equal to 1000 lbs/yr and, in cases where a stack test is required, provides the alternative of conducting a design evaluation.

40 CFR 63.2470 (a)
This citation references the requirements for Sorage Tanks under the MON rule.

40 CFR 63.2470 (d)
This citation states the requirements for planned routine maintenance of Storage Tanks under the MON rule.

40 CFR 63.2475
This citation states the requirements for Transfer Racks under the MON rule.

40 CFR 63.2480
This citation states the requirements for equipment leaks under the MON rule.

40 CFR 63.2485
This citation states the requirements for wastewater streams and liquid streams in open systems within an applicable process unit under the MON rule.

40 CFR 63.2485 (j)
This citation states the requirement to determine the concentration and flow rate for wastewater streams within each applicable process unit under the MON rule.

40 CFR 63.2490
This regulation sets forth the requirements for heat exchangers used in miscellaneous organic chemical manufacture.

40 CFR 63.2520
This citation includes the reporting requirements , specifically the Semiannual Compliance report, under the Miscellaneous Organic Chemical Manufacturing rule (Subpart FFFF).

40 CFR 63.2525
Under this citation, compliance options are described when the facility's equipement is subject

to both Subpart FFFF and another Subpart.

40 CFR 63.2535 (h)
This citation describes the options of compliance under Subpart FFFF instead of compliance with 40 CFR 60 Subpart DDD, III, NNN, or RRR.

40 CFR 63.2535 (k)
Under this citation, compliance options are described when the facility's equipement is subject to both Subpart FFFF and 40 CFR 60 Subpart VV or 40 CFR 61Subpart V.

40 CFR 63.2535 (l)
This citation explains the option of creating a Process Unit Group (PUG) under Subpart FFFF which may then be used to demonstrate compliance with other Part 63 rules.

40 CFR 63.2540
This citation references the General Provisions that apply to a MON applicable facility.

40 CFR 63.3340
This citation specifies which general provisions of Subpart A apply to sources applicable to the Paper and Other Web Coating MACT (Subpart JJJJ).

40 CFR 63.3370 (c)
This citation specifies the compliance requirements for affected Subpart JJJJ sources to meet the organic HAP limits specified in the rule.

40 CFR 63.3400 (c) (2)
This condition spells out the information that needs to be submitted in the semi-annual compliance reports that must be submitted in order to show that the facility has been meeting the emission limits contained in this subpart.

40 CFR 63.3410 (a)
This condition spells out which records the facility must keep in order to prove that the facility is meeting the requirements in this subpart. The records need to be kept on a monthly basis and include items such as CEM data, material usage, HAP content, and operating parameter data.

40 CFR 63.6602
These conditions list the emission limits, operating limits, and work practices that existing engines with a site rating less than or equal to 500 brake horsepower located at a major source of HAP emissions must meet.

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

40 CFR 63.6625 (e)
This regulation requires the owners or operator of an existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions, an existing stationary emergency RICE, or an existing stationary RICE located at an area source of HAP emissions must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

40 CFR 63.6625 (f)
This regulation requires the owners or operator of an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary emergency RICE located at an area source of HAP emissions, to install a non-resettable hour meter if one is not already installed.

40 CFR 63.6625 (h)
This regulation requires the owner or operator of a reciprocating internal combustion engine, operating at a major source of hazardous air pollutants, to minimize the idling time of the engine at startup. Startup time is limited to 30 minutes or less.

40 CFR 63.6640 (f) (1)
This regulation sets forth the compliance provisions for the operation of reciprocating internal combustion engines in emergency situations.

40 CFR 63.6655 (f)
This regulation requires the owner/operator of a reciprocating internal combustion engine to record the number of hours the engine has been used, in both emergency and non-emergency use.

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

40 CFR 63.8000 (a)
This citation specifies where to find the emission limits and work practice standards for the Miscellaneous Organic Coatings NESHAP (Subpart HHHHH).

40 CFR 63.8000 (b)
This citation clarifies the allowable conditions and record keeping associated with opening a safety device to avoid unsafe conditions.

40 CFR 63.8015
This citation states the requirements for addressing leaks on equipment subject to certain exclusions.

40 CFR 63.8030
This citation specifies which requirements apply to heat exchange systems.

40 CFR 63.8075 (e)
This citation states the required content of the semiannual compliance reports required under Subpart HHHHH.

40 CFR 63.8095
This citation states where the applicable general provisions can be found in Subpart A.

40 CFR 63.829 (f)
This regulation requires a printing or publishing operation to record the mass of each material applied each month at presses that are being excluded from Subpart KK because the inks, coatings etc. applied at the flexographic and rotogravure stations account for less than 5% of the total coatings, inks, etc. applied on the whole machine. The exemption mostly applies to surface coating and laminating machines that perform "incidental" printing.

40 CFR 64.7

This section states the general requirements of operating and maintaining the monitoring system approved under the facility's CAM Plan.

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

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

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

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

40 CFR Part 63, Subpart FFFF
This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous organic chemical manufacturing and is known as the MON MACT rule. The rule includes emission limits, operating limits and work practice standards for applicable equipment identified under the rule as miscellaneous organic process units (MCPU).

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

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

Subpart 201-6.

6 NYCRR 200.3
No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

6 NYCRR 201-6.4 (f)

6 NYCRR 201-6.4 (f) (1)

6 NYCRR 211.1
This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212.10 (c) (4) (i)
VOC removal efficiency greater than 81% is considered RACT.

6 NYCRR 212.10 (c) (4) (iii)
This section allows source owners who cannot achieve an overall removal efficiency of 81% or use coatings that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the Department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the Department.

6 NYCRR 212.4 (a)
This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

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

6 NYCRR 212.5 (d)
This section specifies that if best available control technologies are implemented the commissioner may specify, under certain situations, a less restrictive emission rate.

6 NYCRR 212.5 (e)
If a process emission source meets certain other requirements the source is considered as having met the requirements of this Part. More details are provided in the regulation.

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

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

6 NYCRR 227-2.4
This section specifies control requirements for boilers, turbines, and reciprocating engines.

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

6 NYCRR 228-1.1 (a) (3)
This citation specifies that a coating line subject to Surface Coating regulation will remain subject to the requirements even if emissions of volatile organic compounds later fall below the applicability thresholds.

6 NYCRR 228-1.3 (a)
This citation of the Surface Coating rule establishes a 20% opacity limit (on a 6 minute average basis) for subject emission points.

6 NYCRR 228-1.3 (c)
This citation prohits the sale, or specification for use, of coatings which are prohited by the provisions of Subpart 228-1 except where the affected facility complies with control equipment or an approved coating system, or has been granted a variance.

6 NYCRR 228-1.3 (d)
This citation specifies the work practice requirements (i.e. handling, storage and disposal) to minimize VOC emissions in areas associated with a coating line.

6 NYCRR 228-1.3 (e) (2)
This citation allows for a facility to use up to 55 gallons of non-compliant coatings, provided that the specified records are kept.

6 NYCRR 228-1.4 (d) (3)
This citation specifies the VOC control strategies for Class D coating lines, including magnetic wire, metal cans, coil, vinyl, fabric, paper, film and foil coating lines.

6 NYCRR 228-1.5 (d)
This citation specifies the VOC control requirements for compliance using a coating system as a control strategy. The coating system approach may be used where more than one coating is applied sequentially at the same coating line and the overall system is compliant as demonstrated using the equations shown at this citation. Each coating system must be approved by the Department prior to use.

6 NYCRR 228-1.5 (e)
This citation specifies the requirements for applying for a variance from the VOC controls by making a process specific RACT (Reasonably Available Control Technology) demonstration.

6 NYCRR 228-1.6 (a)
This citation specifies the approved EPA methods for sample and analysis of VOC content of a coating, when asked by the Department to conduct such analyis.

6 NYCRR 228-1.6 (c)
This citation states that a facility owner must allow representatives of the Department to enter their property during reasonable business hours to obtain samples of coatings for the purpose of determining compliance.

6 NYCRR 228-1.6 (h)
This citation states that instances of non-compliance related to the surface coating rule must be reported to the Department within 30 days of recognizing the problem.

6 NYCRR 228-2.3 (e)
This regulation requires that if an operator uses a commercial or industrial adhesive or sealant subject to a specific VOC content limit for such adhesive or sealant in table 1 of section 228-2.3, such specific limit is applicable rather than an adhesive-to-substrate limit; and if an adhesive is used to bond dissimilar substrates together, the applicable substrate category with the highest VOC content shall be the limit for such use.

6 NYCRR 228-2.3 (f) (1)

This citation specifies the limits for surface preparation and cleanup solvents regulated under Subpart 228-2.

6 NYCRR 228-2.3 (f) (3)
This citation specifies the requirements to minimize VOCs by limiting the vapor pressure of cleanup solvents used.

6 NYCRR 228-2.3 (f) (4)
This citation specifies the work practice requirements for clean up of the spray application equipment.

6 NYCRR 228-2.3 (h)
This citation specifies the VOC control approaches for adhesive application processes at facilities where the total 12-month VOC emissions exceeds 3 tons.

6 NYCRR 228-2.3 (i)
This citation states the general prohibition of use (or specification for use) of adhesives, sealants, adhesive primers, sealant primer, surface preparation or clean-up solvents which violate 228-2.

6 NYCRR 228-2.4
This citation describes the exemptions to these requirements.

6 NYCRR 228-2.5 (a)
This regulation sets forth the recordkeeping requirements to show compliance with the VOC limits in 6 NYCRR 228-2.3.

6 NYCRR 228-2.5 (d)
This citation specifies the record keeping requirements for adhesives, sealants, adhesive primers and sealant primers subject to the laboratory testing exemption under 228-2.4(a)(1) of the Subpart.

6 NYCRR 228-2.7 (b)
This citation states the acceptable methods for calculating the VOC content of an adhesive, sealant, adhesive primer or sealant primer.

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

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

6 NYCRR 231-11.2 (b)
This citation lists the record keeping requirements for insignificant modifications that are less than 50% of the applicable significant project threshold including excluded emissions as defined in Part 231-4.1(b)(40)(i)(c).

6 NYCRR 231-11.2 (c)
This subdivision lists the reasonable possibility requirements for insignificant modifications that are greater than 50% of the threshold including excluded emissions as defined in 231-4.1(b)(40)(i)(c) of this Part.

6 NYCRR 231-2.12
The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

6 NYCRR 231-2.2 (d) (3)
The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The purpose of Section 231-2.2 is to define what new or modified facilities are subject to the requirements set forth in the other sections of the rule. The specific applicability exemptions to Subpart 231-2 are set forth in subsection (d).

6 NYCRR 233.3
This citation specifies the control requirements for equipment subject to the Pharmaceutical and Cosmetic Manufacturing RACT rule.

6 NYCRR 233.3 (g)
This citation specifies leak repair provisions for equipment subject to the Pharmaceutical and Cosmetic Manufacturing RACT rule.

6 NYCRR 233.3 (h) (1)
This condition allows the facility to operate with a lesser degree on control than is otherwise required in the pharmaceutical and cosmetic manufacturing processes rule (Part 233) under certain circumstances. The facility must submit reports discussing the practicality of using technologies that would control the process to the levels indicated in the rule, using technologies that do not control the process to the levels indicated in the rule, and modifying the process to reduce volatile organic compound emissions from the process.

6 NYCRR 234.5
This regulation requires that a person shall not sell, specify, or require the application of a coating, ink or adhesive on a substrate if such activity is prohibited by any of the provisions of this Part.

6 NYCRR 234.6
This regulation specifies the following:

An owner or operator of a facility subject to this Part shall not:

(a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

6 NYCRR 234.7
This regulation sets forth the record keeping requirements for facilities subject ot the reuqirements of Part 234.

6 NYCRR 234.8
This regulation requires that emissions from a unit subject to Part 234 shall not have an opacity greater than 10%.

6 NYCRR 236.2 (c)

This regulation allows facilities to substitute compliance with stricter leak detection and repair (LDAR) plans required by Federal regulations for the LDAR requirements of Part 236.

6 NYCRR Part 207

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

6 NYCRR Part 226

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

Compliance Certification
Summary of monitoring activities at EASTMAN BUSINESS PARK:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-00024/-/E63/351AP	324	record keeping/maintenance procedures
U-00024/-/E63/351AP	325	record keeping/maintenance procedures
FACILITY	43	monitoring of process or control device parameters as surrogate
FACILITY	45	record keeping/maintenance procedures
FACILITY	46	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures
U-00021	245	record keeping/maintenance procedures
U-00021	1-38	record keeping/maintenance procedures
U-00021/14201/H80	1-53	monitoring of process or control device parameters as surrogate
U-00021	247	record keeping/maintenance procedures
U-00021	249	record keeping/maintenance procedures
U-00021	1-39	record keeping/maintenance procedures
U-00021	250	record keeping/maintenance procedures
U-00021	1-40	record keeping/maintenance procedures
U-00009	166	record keeping/maintenance procedures
U-00009	167	record keeping/maintenance procedures
U-00009	168	record keeping/maintenance procedures
U-00021/12007/H81	1-50	monitoring of process or control device parameters as surrogate
U-00021/14201/H81	1-54	monitoring of process or control device parameters as surrogate
U-00009	169	record keeping/maintenance procedures
U-00021/-/H81	252	record keeping/maintenance procedures
U-00009	1-32	record keeping/maintenance procedures
U-00009	170	record keeping/maintenance procedures
U-00009	171	record keeping/maintenance procedures
U-00009	172	record keeping/maintenance procedures
U-00009	173	record keeping/maintenance procedures
U-00009	175	record keeping/maintenance procedures
U-00021/-/H81	1-41	record keeping/maintenance procedures

U-00021/-/H81	1-42	record keeping/maintenance procedures
U-00021/-/H81	1-43	record keeping/maintenance procedures
U-00021/-/H81	1-44	record keeping/maintenance procedures
U-00021/-/H81	1-45	record keeping/maintenance procedures
U-00021/-/H81	257	record keeping/maintenance procedures
U-00053	406	record keeping/maintenance procedures
U-00053/325X3/I35/325AP	1-80	record keeping/maintenance procedures
U-00053/325X3/I35/325AP	435	record keeping/maintenance procedures
U-00053/325X3/I35/325AP	436	record keeping/maintenance procedures
U-00060	1-88	record keeping/maintenance procedures
U-00060	469	record keeping/maintenance procedures
U-00060	470	record keeping/maintenance procedures
U-00060	471	record keeping/maintenance procedures
U-00053/-/I35	422	record keeping/maintenance procedures
U-00060	473	record keeping/maintenance procedures
U-00021/-/H81	259	record keeping/maintenance procedures
U-00021/-/H81	1-46	record keeping/maintenance procedures
U-00025	338	record keeping/maintenance procedures
U-00053/-/I35	423	record keeping/maintenance procedures
U-00060	474	record keeping/maintenance procedures
U-00060/304B0	1-96	monitoring of process or control device parameters as surrogate
U-00060/304B0	515	monitoring of process or control device parameters as surrogate
U-00060/304B0	517	monitoring of process or control device parameters as surrogate
U-00060/304X1	1-97	monitoring of process or control device parameters as surrogate
U-00060/304X1	524	monitoring of process or control device parameters as surrogate
U-00060/304X1	525	monitoring of process or control device parameters as surrogate
U-00025	339	record keeping/maintenance procedures
U-00053/-/I35	424	record keeping/maintenance procedures
U-00060	475	record keeping/maintenance procedures
U-00053/325X3/I35/325AP	1-81	monitoring of process or control device parameters as surrogate
U-00053/325X3/I35/325AP	1-82	monitoring of process or control device parameters as surrogate
U-00053/325X3/I35/325AP	439	monitoring of process or control device parameters as surrogate
U-00060/303X1	1-93	monitoring of process or control device parameters as surrogate
U-00060/303X1	1-94	monitoring of process or control device parameters as surrogate
U-00060/303X1	1-95	monitoring of process or control device parameters as surrogate
U-00021/-/H81	261	record keeping/maintenance procedures
U-00009	176	record keeping/maintenance procedures
U-00021/-/H81	262	record keeping/maintenance procedures
U-00021/-/H81	263	record keeping/maintenance procedures
U-00009	177	record keeping/maintenance procedures
U-00009	178	record keeping/maintenance procedures
U-00009	179	record keeping/maintenance procedures
U-00009	180	record keeping/maintenance procedures
U-00009	181	record keeping/maintenance procedures
U-00009	182	record keeping/maintenance procedures
U-00009	183	record keeping/maintenance procedures
U-00009	184	record keeping/maintenance procedures
U-00009	185	record keeping/maintenance procedures
U-00009	186	record keeping/maintenance procedures
U-00021/-/H81	264	record keeping/maintenance procedures
U-00021/-/H81	265	record keeping/maintenance procedures
U-00021/-/H81	266	record keeping/maintenance procedures

U-00021/-/H81	267	record keeping/maintenance procedures
U-00021/-/H81	268	record keeping/maintenance procedures
U-00021/-/H81	269	record keeping/maintenance procedures
U-00021/-/H81	270	record keeping/maintenance procedures
U-00021/-/H81	271	record keeping/maintenance procedures
U-00021/-/H81	272	record keeping/maintenance procedures
U-00023/-/H07	294	record keeping/maintenance procedures
U-00023/-/H07	295	record keeping/maintenance procedures
U-00023/-/H07	296	record keeping/maintenance procedures
U-00023/-/H07	297	record keeping/maintenance procedures
U-00023/-/H07	298	record keeping/maintenance procedures
U-00025	1-68	record keeping/maintenance procedures
U-00025	340	record keeping/maintenance procedures
U-00025	341	record keeping/maintenance procedures
U-00025	343	record keeping/maintenance procedures
U-00025	344	record keeping/maintenance procedures
U-00025	345	record keeping/maintenance procedures
U-00025	346	record keeping/maintenance procedures
U-00025	347	record keeping/maintenance procedures
U-00025	348	record keeping/maintenance procedures
U-00053	1-78	record keeping/maintenance procedures
U-00053	408	record keeping/maintenance procedures
U-00053	409	record keeping/maintenance procedures
U-00053	410	record keeping/maintenance procedures
U-00053	411	record keeping/maintenance procedures
U-00053	412	record keeping/maintenance procedures
U-00053	413	record keeping/maintenance procedures
U-00053	414	record keeping/maintenance procedures
U-00053	415	record keeping/maintenance procedures
U-00056	444	record keeping/maintenance procedures
U-00056	445	record keeping/maintenance procedures
U-00056	446	record keeping/maintenance procedures
U-00056	447	record keeping/maintenance procedures
U-00056	448	record keeping/maintenance procedures
U-00056	449	record keeping/maintenance procedures
U-00056/-/I33	1-84	record keeping/maintenance procedures
U-00060	1-89	record keeping/maintenance procedures
U-00060	476	record keeping/maintenance procedures
U-00060	477	record keeping/maintenance procedures
U-00060	479	record keeping/maintenance procedures
U-00060	480	record keeping/maintenance procedures
U-00060	481	record keeping/maintenance procedures
U-00060	482	record keeping/maintenance procedures
U-00060	483	record keeping/maintenance procedures
U-00060	484	record keeping/maintenance procedures
U-00009	187	record keeping/maintenance procedures
U-00009	188	record keeping/maintenance procedures
U-00009	189	record keeping/maintenance procedures
U-00009	190	record keeping/maintenance procedures
U-00021/-/H81	273	record keeping/maintenance procedures
U-00021/-/H81	274	record keeping/maintenance procedures
U-00021/-/H81	275	record keeping/maintenance procedures
U-00021/-/H81	276	record keeping/maintenance procedures
U-00023/-/H07	299	record keeping/maintenance procedures
U-00023/-/H07	300	record keeping/maintenance procedures
U-00025	349	record keeping/maintenance procedures
U-00025	350	record keeping/maintenance procedures
U-00025	351	record keeping/maintenance procedures
U-00053	416	record keeping/maintenance procedures
U-00053	417	record keeping/maintenance procedures
U-00053	418	record keeping/maintenance procedures
U-00056	1-83	record keeping/maintenance procedures
U-00056	450	record keeping/maintenance procedures
U-00056/-/I33	456	record keeping/maintenance procedures

U-00060	485	record keeping/maintenance procedures
U-00060	486	record keeping/maintenance procedures
U-00060	487	record keeping/maintenance procedures
U-00060	488	record keeping/maintenance procedures
U-00060	489	record keeping/maintenance procedures
U-00009	191	record keeping/maintenance procedures
U-00021/-/H81	277	record keeping/maintenance procedures
U-00023/-/H07	301	record keeping/maintenance procedures
U-00025	353	record keeping/maintenance procedures
U-00053	419	record keeping/maintenance procedures
U-00060	490	record keeping/maintenance procedures
U-00089	594	record keeping/maintenance procedures
U-00009	192	record keeping/maintenance procedures
U-00009	193	record keeping/maintenance procedures
U-00021/-/H81	278	record keeping/maintenance procedures
U-00021/-/H81	279	record keeping/maintenance procedures
U-00025	354	record keeping/maintenance procedures
U-00025	355	record keeping/maintenance procedures
U-00053/-/I35	425	record keeping/maintenance procedures
U-00053/-/I35	426	record keeping/maintenance procedures
U-00056	451	record keeping/maintenance procedures
U-00056	452	record keeping/maintenance procedures
U-00060	491	record keeping/maintenance procedures
U-00060	492	record keeping/maintenance procedures
FACILITY	1-24	record keeping/maintenance procedures
U-00009	194	record keeping/maintenance procedures
U-00009	195	record keeping/maintenance procedures
U-00009	196	record keeping/maintenance procedures
U-00009	197	record keeping/maintenance procedures
U-00021/-/H81	1-47	record keeping/maintenance procedures
U-00021/-/H81	280	record keeping/maintenance procedures
U-00021/-/H81	281	record keeping/maintenance procedures
U-00021/-/H81	283	record keeping/maintenance procedures
U-00021/-/H81	284	record keeping/maintenance procedures
U-00023/-/H07	302	record keeping/maintenance procedures
U-00023/-/H07	303	record keeping/maintenance procedures
U-00023/-/H07	304	record keeping/maintenance procedures
U-00025	356	record keeping/maintenance procedures
U-00025	357	record keeping/maintenance procedures
U-00025	358	record keeping/maintenance procedures
U-00025	359	record keeping/maintenance procedures
U-00053	420	record keeping/maintenance procedures
U-00053/-/I35	427	record keeping/maintenance procedures
U-00053/-/I35	428	record keeping/maintenance procedures
U-00053/-/I35	429	record keeping/maintenance procedures
U-00053/325X3/I35/325AP	441	record keeping/maintenance procedures
U-00056	453	record keeping/maintenance procedures
U-00056	454	record keeping/maintenance procedures
U-00056/-/I33	457	record keeping/maintenance procedures
U-00056/-/I33	458	record keeping/maintenance procedures
U-00060	493	record keeping/maintenance procedures
U-00060	494	record keeping/maintenance procedures
U-00060	495	record keeping/maintenance procedures
U-00060	496	record keeping/maintenance procedures
U-00060	497	record keeping/maintenance procedures
U-00089	595	record keeping/maintenance procedures
U-00089	596	record keeping/maintenance procedures
U-00089	597	record keeping/maintenance procedures
FACILITY	1-25	record keeping/maintenance procedures
FACILITY	1-26	record keeping/maintenance procedures
U-00016	233	record keeping/maintenance procedures
U-00060/-/I52	1-91	record keeping/maintenance procedures
FACILITY	1-27	record keeping/maintenance procedures
FACILITY	1-28	record keeping/maintenance procedures

FACILITY	61	record keeping/maintenance procedures
FACILITY	1-29	work practice involving specific operations
FACILITY	1-30	record keeping/maintenance procedures
FACILITY	1-31	record keeping/maintenance procedures
U-00084	1-105	record keeping/maintenance procedures
F-AC003/-/SIL	84	record keeping/maintenance procedures
F-AC003/-/SIL	85	record keeping/maintenance procedures
F-AC003/-/SIL	86	record keeping/maintenance procedures
F-AC003/-/SIL	87	record keeping/maintenance procedures
F-AC003/-/SIL	88	record keeping/maintenance procedures
F-AC003/-/SIL	89	record keeping/maintenance procedures
F-AC003	73	record keeping/maintenance procedures
U-00060/304B0/I45/30417	522	monitoring of process or control device parameters as surrogate
FACILITY	65	record keeping/maintenance procedures
FACILITY	66	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures
FACILITY	1-4	record keeping/maintenance procedures
FACILITY	1-5	record keeping/maintenance procedures
FACILITY	1-13	record keeping/maintenance procedures
FACILITY	1-14	record keeping/maintenance procedures
U-00021	1-36	record keeping/maintenance procedures
U-00024	1-57	record keeping/maintenance procedures
U-00084	1-103	record keeping/maintenance procedures
U-00085	1-112	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
U-00021/12007	1-49	monitoring of process or control device parameters as surrogate
U-00021/14201	1-52	monitoring of process or control device parameters as surrogate
U-00090/326C7	1-132	monitoring of process or control device parameters as surrogate
U-00012/030N1/P04/030AW	1-33	record keeping/maintenance procedures
U-00021/11601	1-48	record keeping/maintenance procedures
U-00021/120A5	1-51	record keeping/maintenance procedures
U-00047/03810/P65/038AB	1-75	record keeping/maintenance procedures
U-00047/03816/P65/038AG	1-76	record keeping/maintenance procedures
U-00053/-/I35	1-79	record keeping/maintenance procedures
U-00056/304A8	461	record keeping/maintenance procedures
U-00060	1-87	record keeping/maintenance procedures
U-00084/308B7/G05	541	record keeping/maintenance procedures
U-00021/11601	1-134	record keeping/maintenance procedures
U-00021/12007	1-135	monitoring of process or control device parameters as surrogate
U-00021/120A5	1-136	record keeping/maintenance procedures
U-00021/14201	1-137	monitoring of process or control device parameters as surrogate
U-00047/03816/P65/038AG	1-138	record keeping/maintenance procedures
U-00053/325X3	1-139	record keeping/maintenance procedures
U-00053/325X3	643	monitoring of process or control device parameters as surrogate
U-00056/304A8	1-140	record keeping/maintenance procedures
U-00060	1-141	record keeping/maintenance procedures
U-00060/303A8	647	monitoring of process or control device parameters as surrogate
U-00060/303B1	648	monitoring of process or control device parameters as surrogate
U-00060/303X1	649	monitoring of process or control device parameters as surrogate
U-00060/304B0	650	monitoring of process or control device parameters as surrogate
U-00060/304B0/I45	651	monitoring of process or control device parameters as surrogate
U-00060/304X1	652	monitoring of process or control device parameters

		as surrogate
U-00060/304X2	653	monitoring of process or control device parameters as surrogate
U-00084	1-142	record keeping/maintenance procedures
U-00084/308B5	1-143	record keeping/maintenance procedures
U-00090/326C7	1-144	monitoring of process or control device parameters as surrogate
U-00012/-/P04	221	monitoring of process or control device parameters as surrogate
U-00012/03054/P03/030AC	224	record keeping/maintenance procedures
U-00012/03055/P03/030AD	225	record keeping/maintenance procedures
U-00012/03062/P03/030AH	226	record keeping/maintenance procedures
U-00012/030L0/P03/030AM	227	record keeping/maintenance procedures
U-00012/030L1/P03/030AN	228	record keeping/maintenance procedures
U-00012/030L4/P03/030AQ	229	record keeping/maintenance procedures
U-00012/030M9/P03/030AV	230	record keeping/maintenance procedures
U-00016	1-34	monitoring of process or control device parameters as surrogate
U-00023	1-55	monitoring of process or control device parameters as surrogate
U-00023/112A1/H06/112AC	305	monitoring of process or control device parameters as surrogate
U-00024	1-58	monitoring of process or control device parameters as surrogate
U-00024/-/E52	1-59	monitoring of process or control device parameters as surrogate
U-00024/-/E52	1-60	monitoring of process or control device parameters as surrogate
U-00024/-/E52	1-61	record keeping/maintenance procedures
U-00024/-/E52	310	monitoring of process or control device parameters as surrogate
U-00024/317W3/E52/317DL	332	monitoring of process or control device parameters as surrogate
U-00025/-/S05	360	monitoring of process or control device parameters as surrogate
U-00032/-/P93	1-69	monitoring of process or control device parameters as surrogate
U-00053	401	monitoring of process or control device parameters as surrogate
U-00053/325X3	434	monitoring of process or control device parameters as surrogate
U-00056/304A8/I33	463	monitoring of process or control device parameters as surrogate
U-00060	1-85	monitoring of process or control device parameters as surrogate
U-00060/-/I24	498	monitoring of process or control device parameters as surrogate
U-00060/-/I25	499	record keeping/maintenance procedures
U-00060/-/I27/304AA	500	record keeping/maintenance procedures
U-00060/-/I27/304AA	501	record keeping/maintenance procedures
U-00060/-/I27/304AB	502	record keeping/maintenance procedures
U-00060/-/I27/304AB	503	record keeping/maintenance procedures
U-00060/-/I28	504	monitoring of process or control device parameters as surrogate
U-00060/303A8/I26/303AE	509	monitoring of process or control device parameters as surrogate
U-00060/304B0/I45/30410	520	monitoring of process or control device parameters as surrogate
U-00060/304B0/I45/30411	521	record keeping/maintenance procedures
U-00075/08224	527	monitoring of process or control device parameters as surrogate
U-00083/082X8/Y14/082BM	1-101	monitoring of process or control device parameters as surrogate
U-00083/205C5/Y14/205CX	1-102	monitoring of process or control device parameters

		as surrogate
U-00084	530	monitoring of process or control device parameters as surrogate
U-00085	1-113	monitoring of process or control device parameters as surrogate
U-00087	1-119	monitoring of process or control device parameters as surrogate
U-00087/-/N10	1-121	monitoring of process or control device parameters as surrogate
U-00087/349D2/N10/349CA	590	monitoring of process or control device parameters as surrogate
U-00087/349E0/N10/349CK	591	record keeping/maintenance procedures
U-00087/349H4/N44/349EG	592	monitoring of process or control device parameters as surrogate
U-00087/349H9/N44/349EL	593	monitoring of process or control device parameters as surrogate
U-00090	1-124	monitoring of process or control device parameters as surrogate
U-00012	220	record keeping/maintenance procedures
U-00016/082X7	1-35	record keeping/maintenance procedures
U-00023	1-56	record keeping/maintenance procedures
U-00024/-/E52	312	record keeping/maintenance procedures
U-00025/-/S05	361	record keeping/maintenance procedures
U-00032/-/P93	1-70	record keeping/maintenance procedures
U-00053	402	record keeping/maintenance procedures
U-00056/304A8/I33	464	record keeping/maintenance procedures
U-00060	1-86	record keeping/maintenance procedures
U-00075/08224	528	record keeping/maintenance procedures
U-00083	1-98	record keeping/maintenance procedures
U-00084	531	record keeping/maintenance procedures
U-00085	1-114	record keeping/maintenance procedures
U-00087	1-120	record keeping/maintenance procedures
U-00089/082X6/S11	1-122	record keeping/maintenance procedures
U-00090	1-125	record keeping/maintenance procedures
F-AC001	70	record keeping/maintenance procedures
F-AC003/-/SIL	83	monitoring of process or control device parameters as surrogate
U-00024/351C8/E63/351AP	335	intermittent emission testing
U-00084/-/G02/308AB	538	intermittent emission testing
U-00024/-/E63/351AP	1-65	record keeping/maintenance procedures
U-00024/-/E63/351AP	1-66	record keeping/maintenance procedures
U-00024/-/E55	1-62	record keeping/maintenance procedures
U-00047/-/P61	1-71	record keeping/maintenance procedures
U-00084/-/G08	1-106	record keeping/maintenance procedures
U-00084/-/G09	1-108	record keeping/maintenance procedures
U-00084/-/G10	1-109	record keeping/maintenance procedures
U-00085/-/S29	1-117	record keeping/maintenance procedures
U-00085/059K4/S21/059AX	1-118	record keeping/maintenance procedures
U-00024/-/E55	1-63	record keeping/maintenance procedures
U-00047/-/P61	1-72	record keeping/maintenance procedures
U-00084	1-104	record keeping/maintenance procedures
U-00085	1-115	record keeping/maintenance procedures
FACILITY	1-17	record keeping/maintenance procedures
U-00024/-/E55	1-64	work practice involving specific operations
U-00084/-/G08	1-107	work practice involving specific operations
U-00085/-/S21	1-116	work practice involving specific operations
U-00047/-/P61	1-73	work practice involving specific operations
U-00047/-/P61	1-74	record keeping/maintenance procedures
U-00084/-/G10	1-110	record keeping/maintenance procedures
FACILITY	1-18	record keeping/maintenance procedures
FACILITY	1-20	record keeping/maintenance procedures
F-AC004/-/AD1	606	record keeping/maintenance procedures
F-AC004/-/AD1	607	monitoring of process or control device parameters as surrogate

F-AC004/-/AD1	608	monitoring of process or control device parameters as surrogate
F-AC004/-/AD1	609	record keeping/maintenance procedures
F-AC004/-/AD1	610	record keeping/maintenance procedures
F-AC004	605	record keeping/maintenance procedures
F-AC004/-/AD2	614	record keeping/maintenance procedures
F-AC004/-/AD1	612	record keeping/maintenance procedures
F-AC004/-/AD3	616	record keeping/maintenance procedures
U-00012/-/P15	222	record keeping/maintenance procedures
U-00021	244	record keeping/maintenance procedures
U-00053/-/I47	431	record keeping/maintenance procedures
U-00056/-/I48	459	record keeping/maintenance procedures
U-00060/-/I49	505	record keeping/maintenance procedures
U-00087/-/N40/349DA	586	record keeping/maintenance procedures
U-00087/-/N43	588	record keeping/maintenance procedures
U-00090/-/Z03	1-129	record keeping/maintenance procedures
U-00012/-/P15	223	record keeping/maintenance procedures
U-00021	1-37	record keeping/maintenance procedures
U-00053/-/I47	432	record keeping/maintenance procedures
U-00056/-/I48	460	record keeping/maintenance procedures
U-00060/-/I49	506	record keeping/maintenance procedures
U-00087/-/N40/349DA	587	record keeping/maintenance procedures
U-00087/-/N43	589	record keeping/maintenance procedures
U-00090/-/Z03	1-130	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
U-00024/317X5	333	monitoring of process or control device parameters as surrogate
U-00024/317X7	1-67	monitoring of process or control device parameters as surrogate
U-00047/03818	373	monitoring of process or control device parameters as surrogate
U-00053/-/I35/325AT	430	monitoring of process or control device parameters as surrogate
U-00056/304A8	462	monitoring of process or control device parameters as surrogate
U-00060/303A8/I26	508	monitoring of process or control device parameters as surrogate
U-00060/303X2/I26	513	monitoring of process or control device parameters as surrogate
U-00060/30403/I27	514	monitoring of process or control device parameters as surrogate
U-00060/304B0/I45	518	monitoring of process or control device parameters as surrogate
U-00060/304B0/I45	519	monitoring of process or control device parameters as surrogate
U-00084	536	monitoring of process or control device parameters as surrogate
U-00084/08212	1-111	monitoring of process or control device parameters as surrogate
U-00025	336	record keeping/maintenance procedures
U-00053	403	record keeping/maintenance procedures
U-00056	442	record keeping/maintenance procedures
U-00060	466	record keeping/maintenance procedures
U-00025	337	record keeping/maintenance procedures
U-00053	404	record keeping/maintenance procedures
U-00056	443	record keeping/maintenance procedures
U-00060	467	record keeping/maintenance procedures
U-00053	1-77	record keeping/maintenance procedures
U-00060	468	record keeping/maintenance procedures
U-00090/-/Z02	1-126	record keeping/maintenance procedures
U-00090/-/Z02	1-127	record keeping/maintenance procedures
U-00090/-/Z02	1-128	record keeping/maintenance procedures
U-00090/326C6/Z02/326BN	1-131	record keeping/maintenance procedures

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Basis for Monitoring
DESCRIPTION OF MONITORING REQUIREMENTS

6 NYCRR Part 201 Permits and Registrations
6NYCRR Part 201-6.4(c)(3)(ii)
A facility level condition is included in the permit which requires submittal of semi-annual reports for deviations of monitoring conditions in the permit. Also, the condition under this citation establishes procedures for prompt notification of certain permit deviations.

6NYCRR Part 201-6.4(e)
A facility-level condition is included which requires submittal and specifies content of annual compliance certification reports.

6NYCRR Part 201-6.4(f)
A facility-specific condition under this citation includes Kodak's "Operational Flexibility Plan" which makes provisions for facilitating "off permit changes" authorized by the Clean Air Act section 502(b)(10) and 40 CFR 70.2. It allows changes to occur at a facility that are not specifically addressed or prohibited by the permit only after they go through a review protocol outlined in the condition. Any federal or state requirements which apply to the change must already exist in the issued Title V permit. Once the appropriate review is completed, the change may be made without making a formal permit revision or modification.

Operational flexibility may not be applied to projects that are defined as "major" under New York State Uniform Procedures (6NYCRR Part 621) or any project that would be considered a "significant permit modification" under 6NYCRR Part 201-6. This prohibition specifically includes modifications under Title I of the Clean Air Act and any change that would exceed the emissions allowable under the permit, whether expressed as a rate or in terms of total emissions.

On a semi-annual basis, Kodak submits a report of all changes made via these operational flexibility provisions during the reporting period. This report assures that both Kodak and the Department have tracked all the operational changes that may not yet be reflected in the current permit.

A second condition included under this citation specifies future MACT applicability. Specifically, Kodak owns and operates two units that will be subject to 40 CFR 63 Subpart DDDDD: the 45 mmbtu/hr natural gas Hot Oil heater (EU U-00024, Process E63, ES 351AE) and Bldg 308 3 mmbtu/hr natural gas Dryers (EU U-00084, Process G02, ES 308AB). The compliance date for these existing sources is January 31, 2016. If and when these sources continue to operate by the compliance date, Kodak will propose more specific permit conditions to comply with the Subpart DDDDD requirements.At that time, periodic tune-ups will be required for both these sources.

6 NYCRR Part 201-6.4(f)(1)
Kodak operates some Emission Sources which are permitted under more than one operating scenario. These alternate operating scenarios (AOS) are defined by Processes within Emission Units, where multiple Processes share 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, Kodak 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.

In this latest version of the Permit, a permit condition which states the requirements for alternate operating scenarios described has been included for EU U-00021, U-00024, U-00084 and, U-00085.

6NYCRR Part 202-2 Emission Statements
6NYCRR Part 202-2.1
A condition under this citation sets the annual emission statement reporting deadline.

6NYCRR Part 212 General Process Emission Sources
6NYCRR Part 212.4(a)
For emission points having authorized emissions which exceed the thresholds for a required percentage of control according to Tables 2, 3, or 4 of Part 212, conditions are included in the permit which specify monitoring requirements for control devices and/or process parameters. For example, where scrubber systems are used to meet the control requirements for specific contaminants in the Solvent Recovery Operations area (EU U-00021, EP 14201) and the Functional Printing area (EU U-00090, EP 326C7), monitoring conditions have been included to maintain appropriate fluid flow rates through the scrubbers.

In some cases where it has been demonstrated that it is not feasible to meet the specified control percentage, a BACT analysis is conducted and a condition specifying an alternate limit and record keeping requirements is included in the permit as allowed by 212.5(d). Record keeping conditions have been included at the emission unit level for the following emission units which have been granted alternate emission limits under this provision:
EU U-00021 (Emission Points 120A5 and 116-1Distilling East Operations)
EU U-00047 (EP 03816, Web Coating Operations)
EU U-00053 (Bldg 325 West Chemicals Department)
EU U-00056 (EP 304A8 Batch Chemicals)
EU U-00060 (North Chemicals Department Bldgs 301, 303, 304, 337)
EU U-00084 (Bldg 308B5 & 308B7 DPC Coating Machine)

The record keeping required to demonstrate compliance with an alternate limit for emissions subject to Part 212 is specific to the operating area. Typically it will specify that records include chemical/raw material usage logs and calculations based on the best available emission factors or latest test data. The condition specifies the format of the records – generally, monthly totals of each subject contaminant and a total for the 12 most recent months of data (12-month rolling total) to show compliance with the annual rolling total limit in tons per year.

As an example, the records for the small scale chemical operations (relocated from Bldg 148 to Bldg 337) specify records of raw material usage data, engineering calculations based on established emission factors, and a log showing the 12-month rolling emissions totals. In this case, the factors used to calculate the emissions were determined from mass balances performed on typical processes in this area, resulting in conservative emission factors (i.e. overestimating) as follows: 5.4% loss of ethanol, 14.2% for acetone, 34.1% for heptanes, and 29% for methylene chloride and all other contaminants.

For emission points having authorized emissions below the thresholds for specified level of control under Tables 2,3 or 4 of Part 212, a general condition stating that these thresholds would not be exceeded was included in the permit at the facility level.

6NYCRR Part 212.4(c)

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

Many of the permit conditions included for this purpose require monitoring of control equipment and/or process parameters and/or periodic maintenance and record keeping to indicate mandated control of particulate emissions. For example, the pressure drop across a dry particulate filter (baghouse, HEPA filter,etc...) is a common monitoring method used to ensure that the filter is intact and providing the collection efficiency as designed. Sources in Emission Units U-00083 and EU U-00024 are equipped with particulate filters and so monitoring conditions requiring that a specified pressure differential across the filter have been included in the permit.

Kodak also uses "bag break detectors" to monitor particulate collection. For certain applications these particle detectors are a more precise way of monitoring compliance. The permit specifies monitoring compliance using "bag break detectors" for toner manufacturing sources in Bldg 349 (EU U00087). For sources with bag break detectors in EU U00087, the 0.05 grains/dscf particulate limit is provided in units of ug/m3, as it's read by the monitoring instrument. Particulate monitoring requirements may also include periodic replacement of dry filter elements to maintain emission control efficiency and stack testing as required by the Department to demonstrate compliance with particulate emission standards.

Many particulate sources subject to Part 212.4(c) do not need a control device to comply with the 0.05 grains/dscf particulate standard. For example, small scale mixing and pouring operations typically have very low particulate emission rates. In these cases, process knowledge, operating conditions, emission sampling data and calculations, and other information from the permit file are used assess and demonstrate on-going compliance. For such sources, the permit requires that on a semiannual basis, Kodak review all of the data and operating parameters related to the particulate emission rate (ex. production rate, raw material supply, air flow etc..) to verify the accuracy of the reported particulate emission rate. Additionally, the permit condition requires that they investigate and correct any instance where there is cause to believe that particulate emissions above 0.05 grains/dscf are occurring or have occurred. If there is still a doubt as to whether the standard is being met, the Department may require a particulate stack test at any time.

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

For some emission sources where opacity has historically been a more common problem (ie: boilers and other combustion sources) opacity monitoring devices may be required either by regulation or through the permit. In this case, the permit condition would require on-going or continuous compliance demonstration through the direct measurement of opacity in the stack. Kodak no longer operates any such sources.

Kodak operates a number of particulate emission sources which do not warrant continuous opacity monitors. Some, due to their very small potential emissions or their minimal operating time, typically have negligible or very short term (less than six minutes) opacity (a small scale pouring operation, for example). Generally, for these sources which do not have continuous opacity monitors, the permit requires a visible observation on a semi-annual frequency. The permit condition also requires that any instance where there is cause to believe that visible emissions have the potential to exceed the standard must be investigated and followed-up with EPA Method 9 assessment if not corrected within one operating day. If there is still a

doubt as to whether the standard is being met, the Department may conduct, or require, a Method 9 assessment for compliance at any time.

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

Emission Points which are equipped with a capture system and control device are required to demonstrate compliance with the 81% overall removal efficiency for volatile organic compounds (VOCs). For certain types of control devices the rule specifies continuous monitoring parameters. Other parameters may be required by permit conditions to be monitored as deemed necessary to fit facility-specific equipment and operating conditions.

For the refrigerated vent condenser located at Distilling West operations (EU U-00009/ EP 322B1), the outlet gas temperature (or coolant temperature) must be monitored and maintained below a limit which ensures 81% VOC removal as per 212.11(b)(4). For the scrubber system at Distilling West, flow and recirculation rates demonstrated during required MON MACT testing were used for the basis of ensuring VOC controls. Since this equipment is subject to the same monitoring requirements under the MON MACT rule, the Part 212 VOC RACT requirements have been included under the Subpart FFFF permit conditions.

For scrubber systems located in Distilling East (EU U-00021/ EP 12007 and EP 14201), permit conditions which specify continuous monitoring and minimum flow and recirculation rates have been included to ensure 81% VOC removal efficiency.

For scrubber system located in Bldg 326 (EU U-00090), a monitoring condition has been included in the permit which specifies the minimum required flow rate to ensure 81% control of VOCs.

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

For sources which comply with VOC RACT requirements via alternate emission limits, record keeping type permit conditions have been included in the permit to ensure compliance with the established RACT limits on a twelve month rolling basis. The RACT limits are based on demonstrations made to the Department showing the no additional process changes, material substitutions, or add-on controls were both technically and economically feasible towards achieving further reduction of VOC emissions. RACT for these sources must be re-evaluated every five years.

EU U-00012 (EP 030N1 Film Coating Solutions)
EU U-00021 (Emission Points 120A5 and 116-1Distilling East Operations)
EU U-00047 (EP 03810, EP 03816, Web Coating Operations)
EU U-00053 (Bldg 325 West Chemicals Department)
EU U-00056 (EP 304A8 Batch Chemicals)
EU U-00060 (North Chemicals Department Bldgs 301, 303, 304, 337)
EU U-00084 (EP 308B7, DCP Coating Machine)

Batch synthetic chemical manufacturing operations at Kodak , including Emission Units U-00053and U-00060) have VOC RACT limits (12-month rolling total) specified in permit conditions. For these operations, series of reactor vessels are used to make many different chemical products. In order to demonstrate compliance with the limits, monitoring conditions require that Kodak keep production records and calulate the VOC emissions on a monthly basis. Typically, monthly emission calculations of a rolling 12-month total is a sufficient monitoring requirement for a VOC RACT limit. However, in this case, the complexity of the calculations and numerous assumptions necessary warrant additional monitoring strategies. For the purpose of assuring the accuracy of the calculations, the permit conditions requires that every 24 months emissions sampling is conducted on a representative reactor system the results of which can then be compared to the calculated emissions for that system. This is not intended as the primary monitoring requirement- but rather a Q/A check. In addition, the permit requires that monthly leak checks

be performed on centrifuges and pipe-in-trench systems; quarterly leak checks be performed on the reactors and rotary dryers, and purge rates of the reactor inertion systems be checked quarterly. This combination of monitoring requirements make up a conservative approach for compliance assurance for these sources.

6NYCRR Part 226 Solvent Metal Cleaning Processes

A facility level permit condition is included in the permit under EU F-AC001which includes equipment specifications, operating requirements, and work practice standards for cold cleaning degreasers. These work practice requirements must be adhered to on a continuous basis whenever the sources are in use. The proper operating procedures must be posted conspicuously. By their nature, these requirements do not lend themselves to parametric monitoring or regular frequency of inspection. The original Title V permit included a requirement for a daily inspection of subject cleaners, but after further review and consideration, it was determined that daily inspections would be impractical since these sources may not be used on a daily basis. Less frequent inspections (ex. weekly) would not significantly improve compliance with these types of requirements. It was determined that a single monitoring approach would not work for all of the sources subject to these requirements because of the variety of types, sizes and operating frequencies of the degreasers.

Kodak's cold cleaners subject to these requirements are small and may be considered "insignificant activities" (ie. cleaners that would be eligible for an exemption from permitting under Part 201 if not for their applicability to Part 226). Specifically, Part 201-3.2(c)(39) provides an exemption from permitting for solvent metal cleaners which meet certain size and solvent criteria. For the purpose of demonstrating compliance at these smaller degreasers, the permit specifies that the operator must note any deviations from the requirements in the log book.

As specified by the rule, cold cleaning degreasers must be equipped with 1) a cover that operates easily, 2) an internal (under cover) drainage facility, if practical, and 3) a control system. The log kept for purposes described above will also be used to indicate whether the cleaner is equipped with an internal drainage facility. This requirement has been added to the monitoring conditions for cold cleaners in Mod 2 of the Title V. According to the rule-making guidance, "internal drainage facility" refers to the rack or basket for dripping parts to minimize solvent carry-out. Parts must be allowed to drain until dripping stops (at least 15 seconds). At the present time, all of Kodak's cold cleaners subject to this requirement are equipped with internal (under cover) drainage facilities (ie: racks/baskets). Although the rule doesn't specify the conditions under which internal drainage is or is not practical, presumably there may be situations when the size or shape of the part in relation to the cleaner make it impractical to drain the part under cover. In this situation, the facility will take steps to minimize emissions of VOC.

6NYCRR Part 227 Stationary Combustion Installations

6NYCRR Part 227-1.3(a)

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

6 NYCRR Part 227-2.4

Kodak operates a Hot Oil Heater (ES 351AP) subject to the requirements of Subpart 227-2. In order to maintain the "Small Boiler" classification under the Subpart, a condition has been included in the permit under this citation stating that Kodak shall operate the Hot Oil Heater with the natural gas valve set to less than or equal to 20 percent of its range at any time. The linkage between the natural gas valve and the air curtain valve cannot be changed at any time.

6NYCRR Part 227-2.4(d)

To satisfy NOx RACT, an annual boiler tune-up is required for "Small Boilers"(i.e. the Hot Oil Heater).

6NYCRR Part 228-1 Surface Coating Processes

6NYCRR Part 228-1.3(a)

Kodak operates surface coating lines subject to the opacity limits of this citation which are permitted as: EU U-00024/ Process E55; U-00047/Process P61; U-00084/Processes G08 & G10; U-00084/Process S21. The regulation of opacity at 6 NYCRR Part 228-1.3(a) does not specify periodic monitoring. Therefore, the permit must contain periodic monitoring to demonstrate compliance with the 20% opacity limit. Kodak's surface coating operations, typically have very low particulate emission rates and zero or negligable opacity. Based on the particulate emission calculations and other permit file information, it is unlikely that these sources would have opacity in excess of 20 percent in a 6 minute period. In such cases, a visible observation on a semi-annual frequency was permitted. The permit condition also requires that any instance where there is cause to believe that visible emissions have the potential to exceed the standard must be investigated and followed-up with EPA Method 9 assessment if not corrected within one operating day.

6NYCRR Part 228-1.3(d)

These conditions establish prescriptive work practice requirements such as the proper handling and storage of solvents and solvent-laden rags. The containers subject to these requirements are small and may be categorized as "insignificant activities" (ie. containers that would otherwise be eligible for an exemption from permitting under Part 201 if not for the work practice requirements that apply because of their association with a coating line. Specifically, Part 201-3.3(c)(44) provides an exemption from permitting for storage vessels, tanks and containers with a capacity less than 750 gallons. These work practice requirements must be adhered to on a continuous basis whenever the sources are in use. By their nature, these requirements do not lend themselves to parametric monitoring or periodic inspection. The original Title V permit included a requirement for a daily inspection of all the subject containers. After further review and consideration, it was determined that frequent inspections (ex. daily) would be impractical since these are insignificant sources which may not be used on a daily basis. Less frequent inspections (ex. weekly) would not significantly improve compliance with these types of requirements. Operators are accustomed to recording solvent usage for each use. For these reasons, the permit conditions were revised to require that Kodak maintain a log in the operating area and note any open containers found as deviations to be reported to the agency.

6NYCRR Part 228-1.3(e)(2)

This citation allows for an exemption from VOC RACT requirements for small volume specialty coatings. The facility level permit condition requires that records be maintained which show that the facility-wide total of previously approved specialty coatings is less than 55 gallons on a 12 month rolling basis. Currently, operations in Emission Units U-00084 and U-000085 use the low volume specialty coating exemption.

6NYCRR Part 228-1.4(d)(3)

The VOC limit for the "Film, Paper & Foil" coating category was changed from 2.9 lb/gal of regulated coating to 0.08 lb VOC/ lb of total coating in the revised rule. For each of the Emission Units/Processes with applicable coating lines, a monitoring condition has been included in the permit which specifies the records that must be kept as stated in paragraph 228-1.3(b)(1).

Many of the coatings used at Kodak Park are produced by Kodak which means that accurate formulation data is available to demonstrate compliance. Where formulation data is the primary method of compliance demonstration, Kodak is required to keep up-to-date records of the formulation data including certification from the coating manufacturer of the parameters used to determine the VOC content; purchase, usage and/or production records; and any other parameters necessary to verify compliance with the limit. Because the record keeping requirements described in the monitoring conditions are on-going (ie: Kodak completes calculations to ensure compliance and revises the records before any coating formulation changes are

made), the "Monitoring Frequency" specified in the permit conditions is stated as "Continuous". The conditions also state that the Department may selectively require Method 24 testing (or other approved sampling & analysis methods) for confirmation of compliance at any time. Sampling and analysis may be particularly important for coatings supplied by outside vendors when formulation data is not as clear.

6NYCRR Part 228-1.5(d)
Conditions under this ciation, specify the requirements for using a coating system as a VOC control strategy. In accordance with the provisions of this citation, Kodak is approved to use a coating system approach for VOC RACTcompliance calculations associated with the production of color negative film, black and white negative film, black and white reversal film, and unsensitized gel-based coatings on the Building 38 coating machine. While the limit for the "Film, Paper & Foil" coating category has been established as 0.08 lb VOC/ lb total coating, a different limit is necessary because the coating system calculation methodology in 6 NYCRR 228-1.5(d)(3) (Equation 7) requires the use of the VOC content limit (VOC)c in units of pounds of VOC per gallon of coating minus water and excluded compounds. This limit is based upon a “Request for Approval of a Coating System” submitted by Kodak on January 16, 2014, which demonstrated that a limit of 2.9 lb VOC/ gallon coating (minus water & excluded compounds) is actually more restrictive than the Part 228-1 limit of 0.08 lbs VOC/ lb coating, for the type of coatings used by Kodak on the Building 38 machine. A monitoring condition has been included in the permit for Emission Unit U-00047 Process P61 to require records be kept to verify compliance with the coating system limit.

6NYCRR Part 228-1.5(e)
Sets compliance limits for VOC RACT variance for specific coating processes and requires monitoring and periodic re-evaluation of variance. Generally, compliance with a 12 month rolling VOC limit (tons per year) is demonstrated through calculation of monthly emissions using process knowledge and/or sampling data which is then totalled with the previous eleven months for a 12 month total.

A less restrictive VOC emission rate was established for coatings used on the DPC Machine under EU U-00084 (Process G10). A condition is included in the permit which limits VOCs from this emission point to 35 tons per year based on an evaluation submitted in September 2010. The monitoring condition details the type of records necessary to show compliance with this 12-month rolling total limit.

6 NYCRR Part 228-1.6(a)
For surface coating operations complying with a specific VOC content limit, the owner or operator must be prepared to determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with an approved method. Process P61 in Emission Unit U-00047 must comply with the coating system limit of 2.9 lb VOC/gallon of coating (minus water and excluded compounds), while Processes E55 (EU U-00024), Process G08 (U-00084) and Process S21 (U-00085) must comply with the limit of 0.08 lb VOC/ lb total coating.

6 NYCRR Part 228-1.6(h)
This monitoring condition requires that the Department be notified of any instances of non-compliance with the Part 228 rule within 30 days of finding the compliance problem.

6NYCRR Part 228-2 Commercial and Industrial Adhesives, Sealants and Primers

6NYCRR Part 228-2.3(e)
This monitoring condition reflects the language in the regulation under 228-2.3(e)(1) and (2) to explain which VOC content applies under different adhesive-substrate applications.

6NYCRR Part 228-2.3(f)(1)

This monitoring condition limits the VOC content of the surface preparation solvent as stated in the regulation.

6NYCRR Part 228-2.3(f)(3)
This monitoring condition specifies the vapor pressure limit of the cleanup solvent as stated in the regulation.

6NYCRR Part 228-2.4
Monitoring conditions included under this citation state the requirements and criteria for meeting the exemptions from the rule.

6NYCRR Part 228-2.5(d)
This condition describes the record keeping requirements when the lab exemption is being used under 228-2.4(a)(1).

6NYCRR Part 229 Petroleum and Volatile Organic Liquid Storage and Transfer
6NYCRR Part 229.3(e)(2)(v)
A monitoring condition has been included in the permit which requires VOC storage tanks with capacity less than 10,000 gallons to have a conservation vent. The condition requires that the vents are inspected annually and that records of these inspections and any repairs be kept on site.

6NYCRR Part 229.5(d)
A condition has been included in the permit to require documentation of the capacity of the listed VOC storage tanks applicable to this requirement.

6NYCRR Part 231 New Source Review for New and Modified Facilities
6NYCRR Part 231-2 Requirements for Emission Units Subject to the Regulation On or After November 15, 1992 and Prior to the Effective Date of Subparts 231-3 through 231-13
6NYCRR Part 231-2.2(d)(3)
Conditions included under this citation set specific process emission limits to cap VOC emissions below New Source Review (NSR) applicability thresholds and requires compliance calculations and record keeping. In this version of the permit, existing NSR caps are included as listed in the table. None of the existing caps have changed with the exception of the EU U-00085 cap explained further below.

Emission Unit	Emission/ Point/Source	Contaminant	Cap (tons per year)
U-00024	EP 317X5	VOC	66.3 tpy
U-00024	EP 317X7	VOC	39.0 tpy
U-00047	EP 03818	VOC	65.8 tpy
U-00053	ES 325AT	VOC	3.7 tpy
U-00056	EP 304A8	VOC	9.0 tpy
U-00060	EP 303A8	VOC	12.5 tpy
U-00060	EP 303X2	VOC	6.8 tpy

U-00060	EP 30403	VOC	81.0 tpy
U-00060	EP 304B0	Particulates	14.9 tpy
U-00060	EP 304B0	VOC	39.9 tpy
U-00084	EP 308AA	VOC	39.9 tpy
U-00084	EP 08212	VOC	38.7 tpy*

*In the last version of the permit, the NSR cap for EP 08212 was included in EU U-00045. EU U-00045 has been consolidated into EU U-00084. So the cap was moved in the permit. No changes to the operation took place.

In order to demonstrate compliance with these caps, monitoring conditions require mass balance type record keeping calculated monthly and incorporated into a 12-month rolling total to compare to the annual cap in units of tons per year.

A NSR cap for EU U-00085 of 39 tpy has been eliminated in this version of the permit as requested in Kodak's application for significant modification of the permit, submitted on October 30, 2012. The cap was established when the "J9 Machine" in Bldg 59 was upgraded in 2002. As described in Kodak's October 30, 2012 application, the majority of sources related to this source project have been shut down. The two remaining sources which were part of the original source project are chemical preparation and weighing operations with a potential to emit (PTE) VOC less than 1 tpy. Because the PTE is now well below the 40 tpy NSR applicability threshold, the Department agrees that for the purpose of streamlining the permit and reducing unnecessary record keeping, the cap should be eliminated from the permit.

6NYCRR Part 231-2.12
Three Special Conditions in the permit document a total of 62.1 tons of Volatile Organic Compound (VOC) Emission Reduction Credits (ERCs) established through permanent shut down of VOC-emitting processes. In accordance with a Consent Agreement and Final Order (CAFO)(CAA-02-2011-1209) issued by the USEPA, Kodak agreed to retire the 62.1 tons of NYS VOC ERCs documented in the permit. Furthermore, the Department was asked to add language to the permit stating that these ERCs were surrendered under the November 10, 2011CAFO. The three permit conditions have each been revised as requested.

6 NYCRR Part 231-11 Permit and Reasonable Possibility Requirements
6 NYCRR Part 231-11.2
The "Reasonable Possibility" provisions of the revised Part 231 rule have been included under the 231-11.2(b) and (c) citations. These conditions explain that in the case that a project potential is evaluated using the *projected actual* emissions, rather than potential emissions (PTE), additional record keeping is required. Because no specific project has triggered these requirements at the time of the Draft Renewal 1 Title V Permit, these two conditions are included, generically, at the facility level.

6 NYCRR Part 233 Pharmaceutical and Cosmetic Manufacturing
In order to accommodate new business opportunities to produce chemicals for use by pharmaceutical and cosmetics manufacturers using existing equipment in Kodak's Synthetic Chemicals Manufacturing facilities, conditions were added to the Renewal permit ("Ren 1") under Emission Units: U-00025, U-00048, U-00053, U-00056 and U-00060 to specify the applicable operating requirements and VOC limits.

6NYCRR Part 233.3

Under this citation, conditions have been added to the permit for EU U-00025, U-00048 and U-00056 to address the control requirements of paragraphs 233.3(a), (b), (e) and (f). The Synthetic Chemical small scale operations, represented by these three emission units, will operate under the 233.1(g)(2) exemption for reactors, extractors, distillation operations, crystallizers, centrifuges or vacuum dryers and below the threshold for the 233.3(b) control requirements for air dryers and production equipment exhaust systems.

Also under this citation, conditions have been added to the permit for EU U-00053 and U-00060 to address the control requirements of paragraphs 233.3(e) and (f) for centrifuges, filters and in-process tanks used for the manufacture of chemicals pharmaceutical or cosmetic products.

Because the equipment included under EUs U-00053 and U-00060 is not compliant with the control requirements of paragraphs 233.3(a) and (b), these operations will operate under a process specific RACT demonstration in accordance with 233.3(h) when manufacturing chemicals for pharmaceutical or cosmetic products. Paragraph 233.3(a) specifies the maximum outlet temperature for surface condensers associated with reactors, extractors, distillation operations, crystallizers, centrifuges, and vacuum dryers. Depending on the VOCs used, Kodak's condensers will not consistently meet these temperature limits. Paragraph 233.3(b) requires 90% control (or reduction to 33 lbs/day) for VOC emissions from air dryers and production equipment exhaust systems, which Kodak's equipment does not have. Instead, conditions have been added to specify the facility-specific RACT determination under 233.3(h)(1), as described below.

Kodak will not be using any VOC transfer equipment or any storage tanks in the production of pharmaceutical or cosmetic products that would be subject to the control requirements of 233.3(c) or 233.3(d), respectively.

6NYCRR Part 233.3(g)
Conditions under this citation have been included for Emission Units U-00025, U-00048, U-00053, U-00056 and U-00060 to specify the leak repair requirements for equipment subject to Part 233. The facility is required to repair all liquid leaks containing VOC's no later than 15 days after discovering the leak. The facility is allowed to wait until the process is shut down if it is impossible to fix it otherwise. Records must be kept to show that these leak requirements have been met.

6NYCRR Part 233.3(h)(1)
A condition has been included for Kodak's Synthetic Chemicals -West (Bldg 325) large scale operations (EU U-00053) under this citation. This equipment will operate under a 233.3(h) process specific RACT determination for surface condensers associated with reactors, extractors, distillation operations, crystallizers, centrifuges, and vacuum dryers. This equipment is already subject to VOC RACT under Part 212. The RACT determination was re-evaluated in September 2013 and concluded that process changes to upgrade the condensers to reduce coolant temperatures was not cost effective and that existing cooling for these condensers was RACT. Some of the equipment in Bldg 325 has surface condensers that use Chilled Water. All other surface condensers in Bldg 325 use Kodak Water. Bldg 325 does not have any surface condensers that use Glycol. To lower the VOC emissions, upgrading condensers to use Chilled Water or refrigerated ethylene glycol/water solution (Glycol) was among the options included in the RACT evaluation. The proposed condition includes maximum temperature limits for the Bldg 325 Chilled Water and Kodak Water condensers (10 C and 25 C, respectively) and temperature monitoring requirements to optimize VOC controls using the existing equipment.

Air dryers and production equipment exhaust systems in Bldg 325 can be interchangeably used to produce either Part 212 or Part 233 products. This equipment will also operate under a 233.3(h) process specific RACT determination when used to produce pharmaceutical or cosmetic products. The RACT evaluation included assessment of technically feasible control options for various source configurations. None of these options were found to be cost effective. Therefore, the VOC emissions were limited to current baseline of

66 tpy, consistent with the existing Part 212 RACT limit. Emissions resulting from Part 233 operations will be calculated and included under the existing 66 tpy cap.

A second condition under this citation has been included for Kodak's Synthetic Chemicals -North (Bldgs 301-304) large scale operations (EU U-00060). These operations will operate under a 233.3(h) process specific RACT determination for surface condensers associated with reactors, extractors, distillation operations, crystallizers, centrifuges, and vacuum dryers. This equipment is already subject to VOC RACT under Part 212. The RACT evaluation completed in September 2010 determined that process changes to upgrade the condensers to reduce coolant temperatures was not cost effective and that existing cooling for these condensers was RACT. Some surface condenser in Bldg 301-304 that have surface condensers that use Glycol. All other surface condensers in Bldg 301-304 use Kodak Water. Bldg 301-304 does not have any surface condensers that use Chilled Water. The use of Chilled Water or Glycol was among the options included in the RACT evaluation. The proposed condition includes maximum temperature limits for the Bldg 301-304 Glycol and Kodak Water condensers (-10 C and 25 C, respectively) and temperature monitoring requirements to optimize VOC controls using the existing equipment.

Air dryers and production equipment exhaust systems in Bldg 301 - 304 can be interchangeably used to produce either Part 212 or Part 233 products. This equipment will also operate under a 233.3(h) process specific RACT determination when used to produce pharmaceutical or cosmetic products. The September 2010 RACT evaluation included assessment of technically feasible control options for various source configurations. None of these options were found to be cost effective. Therefore, the VOC emissions were limited to the current baseline of 150 tpy, consistent with the existing Part 212 RACT limit. Emissions resulting from Part 233 operations will be calculated and included under the existing 150 tpy cap.

6NYCRR Part 234 Graphic Arts

Emission Source 326BN (EU U-00090) comprise two flexographic printing lines as part of the touch screen sensor manufacturing operations at Bldg 326 of Eastman Business Park. On these print lines, support base will go through a corona treatment section, followed by ink application stations, and finally a curing section where the material will be exposed to ultraviolet light. Pursuant to 6 NYCRR 234.3(a)(2), radiation cured material via ultraviolet light or electron beam printing processes are not subject to the control requirements of 6 NYCRR 234.3. However, the work practice requirements of 234.5, 234.6 and 234.7 apply. The opacity requirements of 234.8 are not applied because emissions are vented into the room.

6NYCRR Part 234.6

These conditions establish prescriptive work practice requirements under 234.6, such as the proper handling and storage of solvents and solvent-laden rags. These work practice requirements must be adhered to on a continuous basis whenever the sources are in use. By their nature, these requirements do not lend themselves to parametric monitoring or regular frequency of inspection. The original Title V permit included a requirement for a daily inspection of all the subject containers. After further review and consideration, it was determined that frequent inspections (ex. daily) would be impractical since these sources may not be used on a daily basis. Less frequent inspections (ex. weekly) would not significantly improve compliance with these types of requirements. Operators are accustomed to recording solvent usage for each use. For these reasons, the permit conditions were revised to require that Kodak maintain a log in the operating area and note any open containers found as deviations to be reported to the agency.

6 NYCRR Part 234.8

Kodak operates printing operations (EU U-00090) which subject to the 10% opacity limit of this rule. Similar to coating operations, Kodak’s printing operations typically have little or no opacity. Therefore, a visible observation on a semi-annual frequency was permitted. The permit condition also requires that any instance where there is cause to believe that visible emissions have the potential to exceed the standard must be investigated and followed-up with EPA Method 9 assessment if not corrected within one operating day.

6NYCRR Park 236 SOCMI Equipment Leaks
EU U-00009 includes a process which produces methanol, triggering Part 236 applicability. In accordance with paragraph 236.2(c), compliance with the MON rule can be used to satisfy equal or less stringent component leak requirements of 6 NYCRR Part 236.

6NYCRR Part 249 Best Available Retrofit Technology
A non-applicability determination has been included in the permit to document that Kodak's BART-eligible emission sources of SO2, NOx and Particulate Matter at Eastman Business Park are not subject to 6NYCRR Part 249 as determined by the Department. The specific sources are documented in a letter from Michael Zapkin, Kodak to Robert Sliwinski, NYSDEC dated September 9, 2010. The Department's determination that these units meet the exemption requirements in 6NYCRR Part 249.1(c)(3) is documented in a response letter from Robert Sliwinski, NYSDEC to Michael Zapkin, Kodak (Subject: BART Eligibility Analysis for Eastman Kodak Company Small Emission Sources at Eastman Business Park).

40 CFR 52-A.21 Prevention of Significant Deterioration
This rule sets emission limits and compliance demonstration requirements for meeting federal Prevention of Significant Deterioration (PSD) requirements for applicable contaminants, including VOC, NOx, Particulate, Sulfur Dioxide and Fluoride.

In previous versions of Kodak's Title V Permit, conditions cited under 40 CFR Part 52 limited the potential increase of applicable contaminants from a project below certain "significance thresholds" for PSD. These PSD "caps" , which allow projects with restricted emissions to go forward without triggering additional PSD requirements, have been moved to the corresponding Part 231 citation (6 NYCRR Part 231-2.2(d)) now that the State's Part 231 rule includes the PSD provisions and has been incorporated into NY's State Implementation Plan (SIP).

40 CFR Part 60 Standards of Performance for New Stationary Sources
40 CFR 60-A General Provisions
Sets general requirements for monitoring, record keeping and reporting for operations subject to federal New Source Performance Standards (NSPS).

40 CFR 60Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR 60-Dc.48c(g)
Under this citation, Kodak must maintain daily records of fuel usage at the Hot Oil Heater (EU U-00024).

40 CFR 60-Dc.48c(i)
This condition requires that the fuel use records required by 40 CFR 60-Dc.48c(g) above be kept for two years.

40 CFR 61- Subpart FF Benzene Waste Operations NESHAP
40 CFR 61-FF.342(a)
This facility-level condition outlines the requirements for chemical manufacturing plants, coke byproduct recovery plants and petroleum refineries to show that they manage less than 10 megagrams (Mg) per year of benzene from facility waste. Staying below this threshold exempts the Kodak facility from the substantive requirements of the Benzene Recovery NESHAP. To demonstrate compliance with the annual 10 Mg limit, the rule specifies a calculation methodology relying on data collected on an annual basis. Therefore, the permit specifies a calculation of annual total benzene waste for demonstration of compliance with the 10 Mg limit. Kodak's annual total of benzene waste subject to this rule has historically been well below 1 Mg per year. In addition to the 10 Mg/year limit, the permit condition requires that the calculation of total

annual benzene be repeated whenever there is a change in the process generating the waste that could cause the quantity to increase to 1 Mg/yr or more. Additional conditions in the permit (see Subpart FF citations below) provide further assurance that accurate records are kept and notification to the agencies would occur if the quantity of benzene wastes approached the applicability threshold. Because of the historically low quantities of benzene waste at Kodak Park and the annual data collection specified by the rule itself, the annual calculation demonstration required by the permit is sufficient.

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

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

40 CFR 61-FF.357(b)
This facility-level condition requires reporting of waste stream changes that could cause benzene emissions to exceed applicability thresholds.

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

40 CFR 63-DD Offsite Waste NESHAP
Non applicability determinations for Subpart DD requirements have been included in the permit for Emission Units U-00009 and U-00021. Used solvents are brought from offsite for recovery at Kodak's two distillation operations. These solvent recovery operations do not meet the applicability criteria of 40 CFR 63 Subpart DD. 680. These solvent recovery operations are not considered "waste management operations", nor do they involve processing of waste oil. The operations are not exempt from applicable regulation of hazardous waste treatment, disposal, and storage facilities. The U-0009 and U-00021 distillation equipment is subject to the requirements of 40 CFR 63 Miscellaneous Organic NESHAP (MON MACT).

40 CFR 63-KK Printing and Publishing NESHAP
40 CFR 63-KK.829(f)
A record keeping condition under this citation has been added to the Permit for EU U-00084 DPC Coating Machine (Emission Source 308AA) to demonstrate that the minimal amount of rotogravure printing performed on this machine is eligible to be excluded from Subpart KK requirements. As explained in Kodak's Minor Modification application ,dated July 2, 2010, the DPC coating machine are potentially subject to Subpart KK MACT requirements because it is capable of making "patterned" coatings (i.e. "printing") as well as continuous web coatings. However, the amount of commercial "printing" done on the DPC Coating Machine is expected to be less than 5% of the total solvent use on the machine. Under 63.821(a)(2)(ii), this coating line may be excluded from the Subpart KK requirements provided that records be kept in accordance with 63.829(f).

Similarly, the GC1 coating machine which was also permitted for limited commercial production as part of the same Minor Modification (application dated 7/2/10), is potentially subject to Subpart KK, but will manufacture only "de minimus" amounts of product for commercial sale and meets the exemption pursuant to 63.820(b).

Note: Per 63.822, a "Rotogravure Press" is defined as "an unwind ro feed section, which may include more than one unwind or feed station (such as on a laminator), a series of individual work staitons, one or more of which is a rotogravure print station, any dryers associated with the work stations, and a rewind, stack, or collection section. Inboard and outboard work stations, including those employing any other technology, such as flexography, are included if they are capable of printing or coating on the same substrate". Applying this definition to the B-308 DPC coating machine, the entire coating machine would meet the definition of a "rotogravure press".

In the first modification of the Renewed Title V permit (Ren1 Mod 1), additional language was added in the first paragraph of the permit condition for 63.829(f) to clarify the applicability criteria under 63.820(b).

40 CFR 63-EEEE Organic Liquid Distribution NESHAP

40 CFR 63.2342(b)
This condition describes the applicable limits and work practice standards for the affected sources in U-00021.

40 CFR 63.2343
This condition establishes the notification, recordkeeping, and reporting requirements for organic liquid distribution emission sources in EU U-00009 and U-00021 that are subject to 40 CFR Part 63 Subpart EEEE but do not require control under the subpart.

40 CFR 63.2346(a)
Under this citation, emissions from Storage Tanks at Bldg 142 (EU U-00021/Process H80) are subject to control requirements. Permit conditions including control device monitoring parameters have been included for the Bldg 142 Scrubber System based on OLD MACT compliance demonstration in September 2007. A specific monitoring condition at this citation specifying fluid flow rate requirements satisfies the requirements in 63.2346, 63.2366 and 63.2374. In addition to the OLD MACT, these operating requirements are included in the permit to demonstrate compliance with equivalent or less stringent requirements of MON MACT, Part 212 VOC RACT and Part 212 BACT.

40 CFR 63.2346(c)
This condition specifies monitoring requirements for each U-00021 pump, valve, and sampling connection subject to 40 CFR Part 63 Subpart EEEE that operates in organic liquids service for at least 300 hours per year.

40 CFR 63.2350
This condition states the general requirements to operate and maintain the U-00021 equipment subject to the rule and to develop a start up, shut down , and malfunction plan (SSMP).

40 CFR 63.2378
This condition spells out the details of demonstrating compliance with the rule.

40 CFR 63.2386
This facility level condition includes the periodic reporting requirements for sources subject to the OLD MACT.

40 CFR 63.2390
These conditions specify the necessary records for demonstrating compliance under OLD MACT.

40 CFR 63.2394
These conditions specify the requirements for proper record keeping under the rule.

40 CFR 63. 2398
This facility level condition references the General Provisions in 40 CFR 63 Subpart A which are applicable to the OLD affected sources in U-00009 and U-00021.

40 CFR 63-FFFF Miscellaneous Organic Chemical Manufacturing NESHAP
Kodak is subject to the requirements of the MON MACT for affected equipment identified as Miscellaneous organic Chemical manufacturing Process Units (MCPUs). MON MACT requirements are included in the Title V permit under Emission Units: U-00009, U-00016, U-00021, U-00023, U-00025, U-00048, U-00053, U-00056, U-00060, and U-00089. The rule applicability and monitoring requirements were included in the permit based on Kodak's Notification of Compliance (NOC) Status document, dated October 7, 2008; Compliance Test reports; correspondence with EPA; and Kodak's own MON applicability assessment. Some emission units which were initially identified as being applicable to the rule have been eliminated from the permit because of source shut downs and/or consolidation with other applicable emission units (ex. U-00002, U-00005, U-00077).

The monitoring requirements included in the permit are specified in Subpart FFFF, or in other sections of Part 63 as referenced in Subpart FFFF, except for monitoring parameters specifically requested by Kodak according to alternative monitoring provisions allowed under the rule and/or facility-specific parameters established through testing. The development of Kodak-specific monitoring conditions are explained in Kodak's Precompliance Reports, dated July 26, 2005 and November 8, 2007 and in EPA's response, dated February 6, 2008:

- Monitoring the supply temperature of the Bldg 322 condenser coolant, as an alternative to the condenser exit temperature required by 63.990(c)(2);

- Monitor the methanol absorber liquid to gas ratio, and fresh and recirculated methanol flow rates, as an alternative to an organic continuous monitoring device required by 63.990(c)(1).

- In accordance with 40 CFR 63.2450(k)(3), daily monitoring of caustic strength of the scrubber effluent as an alternative to continuous pH monitoring for caustic scrubbers used to control only batch process vents is allowed. Kodak will conduct monitoring and recordkeeping to ensure that the strength of caustic solution used in their prescrubbers in EU U-00053 and EU U-00060 meet or exceed the ionic capacity required to provide effective pretreatment. The conditions specify process monitoring and documentation on a per batch basis.

40 CFR 63. 2450(e)
Under this citation several permit conditions are included for applicable closed vent systems with requirements specified in Subpart SS such as for monitoring bypass lines and other record keeping and reporting requirements.

40 CFR 63.2460(b)
Conditions are included under this citation for batch process vents and specifically the procedure for assessing the “group status” for determining the control requirements.

40 CFR 63.2465
To meet the requirements for Group 1 Halogen HAP processes, the four scrubber systems in Syn Chem (EU U-00053 and U-00060) must be operated to achieve less than 1 lb/hr (0.45 kg/hr) halogen HAP emissions. Monitoring conditions are included in the permit which require the a flow meter be operated and a minimum flow rate be maintained while those Group 1 processes are operated. Under Subpart SS, the rule requires that the monitoring results be recorded at least once every 15 minutes. Kodak continuously monitors flow once per minute and has chosen, in accordance with record keeping options available at 63.998(b)(1), to store the block hourly average data, as calculated from all available 1-minute data during the hour.

40 CFR 63.2480
Conditions are included to specify the procedures for detecting equipment leaks specified in Subpart UU.

40 CFR 63.2485
Conditions are included under this citations for the requirements of wastewater streams such as wastewater maintenance procedures in accordance with Subpart F and the requirements for process wastewater containers and record keeping procedures, in accordance with Subpart G.

40 CFR 63.2520
A semiannual compliance report is due each August 31st and February 28th. A monitoring condition under this citation details the content of this report.

40 CFR 63.2535(l)
A facility-level condition has been added to the permit as a minor modification of the permit to create a process unit group ("PUG") according to the provisions of this citation. The PUG is developed in order to allow for the manufacture of a pharmaceutical pre-cursor on non-dedicated equipment currently subject to the Miscellaneous Organic Chemical NESHAP (MON) rule without triggering additional requirements under the Pharmaceutical MACT so long as the predominant product from this process group is MON applicable.

40 CFR 63.2540
Sources subject to Subpart FFFF are also subject to portions of the General Provisions in Subpart A of Part 63 according to the applicability identified in Table 12 of Subpart FFFF.

40 CFR 63-JJJJ Paper and Other Web Coating NESHAP
Sources included in EU U-00024 and U-00047 are subject to this MACT rule. Facility-level conditions for Subpart JJJJ specify the requirements for the applicable emission units.

40 CFR 63.3370(c)
This facility level monitoring condition specifies the site-wide organic HAP limit specified under 63.3320(b)(2) and (3) of the Subpart.

40 CFR 63.3400(c)(2)
A semiannual compliance report is due each July 30th and January 31st. A monitoring condition under this citation details the content of this report.

40 CFR 63.3410(a)
This condition specifies the record keeping requirements associated with the site-wide organic HAP limit. Compliance with these limits is demonstrated using formulation data for as-applied coatings. No control devices or CEMS are used to comply with the emission limit.

40 CFR 63- ZZZZ Reciprocating Internal Combustion Engines NESHAP

Kodak is a major source of HAPs subject to the emission limitations and operating limits for hazardous air pollutants (HAPs) emitted from stationary reciprocating internal combustion engines (RICE). Conditions for the RICE rule, effective May 3, 2010, were included in the Renewal ("Ren 1") permit under a new Emission Unit, EU F-AC003, to represent applicable Kodak engines located throughout Eastman Business Park. At the time of "Ren 1" permit, six engines are subject to the rule and are grouped into three Processes according to their applicability category under the rule. Future compliance dates of May 3, 2013 and October 19, 2013 are specified under the rule depending on the type of engine, compression ignition (CI) or spark ignition (SI). In September 2013, all of the CI engines and all engines greater than 500 Bhp were transferred to RED-Rochester.

40 CFR 63.6602

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

40 CFR 63.6625(e)

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

40 CFR 63.6625(f)

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

40 CFR 63.6625(h)

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

40 CFR 63.6640(f)

Conditions under this citation include the requirements for demonstrating compliance with the operating limits for emergency stationary engines. In order to be considered an emergency engine, limitations on the hours of operation apply. Paragraph (f)(1) describes the limitations for emergency stationary RICE with ratings less than or equal to 500 bHP (Processes CIL and SIL). Paragraph (f)(2) describes the limitations for those greater than 500 bHP (Process EHG).

40 CFR 63.6655(f)

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

40 CFR 63-GGGGG Site Remediation NESHAP

A non-applicability determination has been included in the permit to document that Kodak is not subject to 40 CFR 63 Subpart GGGGG since all site remediation activities are performed under a Resource Conservation and Recovery Act (RCRA) corrective action that is required under the site's RCRA permit. Kodak Operations at Eastman Business Park is therefore exempt per 63.7881(b)(3).

40 CFR 64 Compliance Assurance Monitoring (CAM)

For those emission units which CAM applies, the Renwal permit ("Ren 1") includes new CAM conditions or amended existing periodic monitoring conditions at the emission unit level for the pollutant/standard/pollutant-specific emission unit combination(s) that trigger CAM. These conditions are intended to cover the necessary elements of a CAM submittal as described in 64.4.

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

U-00009
EP 322B1 – Methanol & Water Scrubber 212.10(c)(4)(i) VOC RACT
Parametric monitoring is used to demonstrate compliance with 212.10(c)(4)(i) VOC RACT. The parameters used in this demonstration resulted from emissions testing performed November 2006 in compliance with 212.10(c)(4)(i) VOC RACT. The test report was submitted to NYSDEC on 1/29/07. This test report demonstrated that the lowest control efficiency achieved for an individual VOC constituent was 94% (for heptane). On the whole, VOC control efficiencies achieved were significantly higher than is necessary to meet the Part 212 VOC RACT requirement of 81% ORE. CAM for 6 NYCRR 212.10(c)(4)(i) will be satisfied by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Flow rate of recirculated methanol to the methanol scrubber (Control Device 32214);
2. Flow rate of fresh methanol to the methanol scrubber (Control Device 32214);
3. Flow rate of water to the water scrubber (Control Device 32213);
4. Liquid to vapor ratio for the methanol scrubber (Control Device 32214);
5. Liquid to vapor ratio for the water scrubber (Control Device 32213); and
6. Refrigerated vent condenser temperature (Control Device 32207).

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

U-00019
EP 14302 – Wet Scrubber 212.10(c)(3) NOx RACT
Parametric monitoring is used to demonstrate compliance with 212.10(c)(3) NOx RACT. The parameters used in this demonstration were based on past operating history and in-house sampling performed May 12, 2003 confirmed the ability of the scrubbers to meet required control efficiencies. CAM for 6 NYCRR 212.10(c)(3) will be satisfied by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Flow rate of water (Control Device 14303) and
2. Pressure drop (Control Device 14303).

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

U-00021
EP 12007 – Methanol & Water Scrubber 212.10(c)(4)(i) VOC RACT

Parametric monitoring is used to demonstrate compliance with 212.10(c)(4)(i) VOC RACT. The parameters used in this demonstration were based on past operating history and in-house sampling performed May – October 2005 confirmed the ability of the scrubbers to meet required control efficiencies. CAM for 6 NYCRR 212.10(c)(4)(i) will be satisfied by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Flow rate of recirculated methanol to the methanol scrubber (Control Device 12001);
2. Flow rate of fresh methanol to the methanol scrubber (Control Device 12001); and
3. Flow rate of water to the water scrubber (Control Device 12006).

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

U-00021
EP 14201 – Methanol & Water Scrubber **212.10(c)(4)(i) VOC RACT**

Parametric monitoring is used to demonstrate compliance with 212.10(c)(4)(i) VOC RACT. The parameters used in this demonstration were based on past operating history and in-house sampling performed May – October 2005 confirmed the ability of the scrubbers to meet required control efficiencies. CAM for 6 NYCRR 212.10(c)(4)(i) will be satisfied by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Flow rate of recirculated methanol to the methanol scrubber (Control Device 14201);
2. Flow rate of fresh methanol to the methanol scrubber (Control Device 14201); and
3. Flow rate of water to the water scrubber (Control Device 14202).

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

U-00053
CAM Applicability Analysis:
EP 325X3 (Caustic/Water Scrubbers) **212.4(c) Particulate standard**

Emission point 325X3 is an aggregate of 9 individual caustic/water scrubbers that is subject to the particulate standard in 6NYCRR 212.4(c). The combined PTE for particulate on the 325X3 authorized emissions table is 120 tpy. However, the pollutant-specific emissions unit for purposes of determining CAM applicability is the group of emission sources emitting to a single scrubber, because compliance with the particulate standard would be assessed at the actual emission point level not for the aggregate as a whole. Given that the pre-control PTE of particulate for each of these pollutant-specific emission units is less than 100 tpy, CAM does not apply.

U-00060
EP 304B0 (Glycol Condenser) **40 CFR 52.21 – VOC limit**

Outlet glycol temperature is continuously monitored to ensure required control efficiencies are maintained. An alarm system is used to alert operations if elevated glycol temperatures reading occur. If the glycol temperature rises to within 5^{o}C of the compliance temperature, a warning light comes on the control panel. If the temperature rises to within 1^{o}C of the compliance setpoint, an alarm sounds and the process goes into automatic shutdown mode.

The compliance temperature setpoint was selected based on previous emission sampling on the outlet of the condenser. At this setpoint, outlet emissions are sufficiently reduced to comply with a 40CFR 52.21 VOC emissions limit of 39.9 tpy.

U-00087
EP 349E5, EP349E6 and EP349H4 (High Efficiency Particulate Filters) 212.4(c) Particulate standard
Parametric monitoring and operating and maintenance procedures are used to demonstrate compliance with 212.4(c). The parameters and procedures used in this demonstration were based on past operating history, engineering calculations, and manufacturers performance guarantees confirming the ability of the baghouse to meet required control efficiencies. CAM for 6 NYCRR 212.4(c) will be satisfied by following the procedures listed below and by monitoring the following parameters as identified in the existing Title V permit conditions:

1. Continuous monitoring with a leak detector;
2. Perform a visual inspection if an alarm is received; and
3. Make necessary repairs if a leak is detected by visual inspection.

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

U-00087
EP 349D2 (Wet Scrubber) 212.4(c) Particulate standard
Parametric monitoring is used to demonstrate compliance with 212.4(c). The parameter used in this demonstration was based on past operating history, engineering calculations, and manufacturers performance guarantees confirming the ability of the scrubber to meet required control efficiencies. CAM for 6 NYCRR 212.4(c) will be satisfied by following the procedures listed below and by monitoring the following parameters as identified in the existing Title V permit condition:

Maintain flow rate of water to the scrubber (Control Device 34976) at or above 145 gpm.

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

U-00087
EP 349H9 (Wet Dynamic Separator) 212.4(c) Particulate standard
Parametric monitoring is used to demonstrate compliance with 212.4(c). The parameter used in this demonstration was based on past operating history, engineering calculations, and manufacturers performance guarantees confirming the ability of the scrubber to meet required control efficiencies. CAM for 6 NYCRR 212.4(c) will be satisfied by following the procedures listed below and by monitoring the following parameters as identified in the existing Title V permit condition:

1) Maintain pressure drop across the dynamic separator (Control Device 34993) between 4 and 8 "wc. If the pressure falls outside this stated range, dry material feeding & handling operations (ES 349EL) shall cease immediately and maintenance shall be performed.
2) Annual inspection of the dynamic separator and standard preventative maintenance shall be performed as appropriate.

3) Pressure monitoring devices shall be calibrated and maintained per manufacturer's recommendations and local operating procedures.

The indicator ranges for the parameters and monitoring frequencies will be consistent with the limits provided in the Title V Permit. The monitoring frequency satisfies the minimum frequency requirement identified in 64.3(b)(4)(iii) for other pollutant-specific emissions units.

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

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

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